



COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

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Dennis H. Treacy
Director
Thomas L. Henderson
Regional Director

March 15, 2000

Mr. Chris Bagley, HS & E Manager
Hickson Danchem Corporation
P. O. Box 400
Danville, Virginia 24543

Re : Hickson Danchem Corporation
EPA I. D. Number VAD988170684
Compliance Evaluation Inspection

Dear Mr. Bagley:

Thank you for your cooperation during the Compliance Evaluation Inspection (CEI) conducted at the above referenced facility on February 9, 2000, by the Department of Environmental Quality (DEQ), West Central Regional Office. Based on information provided during the inspection, the facility was evaluated for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a Large Quantity Generator (LQG). Checklists completed for the inspection are enclosed.

Based on review of observations, responses, and documents obtained during the inspection, the Department has no information indicating that violations of the Virginia Waste Management Act (1950 Code of Virginia, as amended, §§ 10.1-1400, et seq.) have occurred at the above referenced facility.

The DEQ appreciates the facility's efforts in proper waste management. If you should have further questions or need assistance in the future, please do not hesitate to contact me at (540)562-6799.

Sincerely,

A handwritten signature in cursive script, appearing to read "EL Lohman".

Elizabeth Lohman
Environmental Inspector Sr.

Enclosures

CC : Mr. Aziz Farahmand, P. E., Environmental Program Manager, DEQ-WCRO
DEQ-OTA
WCRO File

**DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION**

**SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES**

NAME OF FACILITY : **Hickson Danchem Corporation**

ADDRESS : **1975 Richmond Boulevard
P. O. Box 400
Danville, Virginia 24543**

EPA I.D. NUMBER : **VAD988170684**

FACILITY
REPRESENTATIVE : **Chris Bagley, HS & E Manager
Scott Van Allen, HS & E Specialist**

TELEPHONE : **(804)797-8120 x. 199**

INSPECTOR : **Elizabeth A. Lohman, Environmental Inspector Senior
William E. Klepper, Environmental Inspector**

DATE OF INSPECTION : **February 9, 2000**

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1. WHAT IS THE BUSINESS ACTIVITY OF THE FIRM? (I.E., FURNITURE MANUFACTURING, METAL PLATING, RECYCLING.)

The facility manufactures custom, specialty chemicals for large chemical distributors.

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2. GIVE A BRIEF DESCRIPTION OF THE WASTE STREAM(S) (BY CHEMICAL NAME IF POSSIBLE) AND HAZARDOUS WASTE CODE(S) GENERATED BY THE FIRM.

See attached summary of non-hazardous and hazardous wastes generated and shipped in 1999.

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3. LIST THE HIGHEST AMOUNTS OF HAZARDOUS WASTE EVER GENERATED IN ANY MONTH OF THE CALENDAR YEAR AND THE GREATEST AMOUNT EVER ACCUMULATED AT THE SITE OF EACH TYPE OF WASTE GENERATED.

See attached summary of non-hazardous and hazardous wastes generated and shipped in 1999.

4. DOES THE FACILITY EVER GENERATE GREATER THAN:

1KG OF ACUTELY TOXIC WASTE (P LISTED WASTE OR F020-F023 AND F026-F027)? YES NO

100KG OF CLEAN-UP FROM A SPILL OF P LISTED WASTE OR F020-F023 AND F026-F027 WASTE? IF YES, THEN THE FACILITY IS A LARGE QUANTITY GENERATOR. YES NO

5. HOW IS THE WASTE PRESENTLY BEING HANDLED? LIST ALL TRANSPORTERS AND FACILITIES AND ON-SITE TREATMENT PERFORMED.

See attached copy of "Transporter and TSDF Companies and EPA ID for Hickson Danchem."

6. DOES THE FACILITY GENERATE ANY HAZARDOUS WASTE THAT IS EXCLUDED FROM REGULATION? IF YES, LIST THE WASTE AND THE BASIS FOR THE EXCLUSION. YES NO

The facility operates a pretreatment system, in which wastewaters are neutralized prior to discharge to the City of Danville POTW.

7. DOES THE FACILITY GENERATE, MARKET, BURN USED OIL THAT IS BURNED FOR ENERGY RECOVERY? IF THE FACILITY MARKETS OR BURNS USED OIL, COMPLETE THE USED OIL CHECKLIST. YES NO

The facility generates used oil which is shipped off-site for fuels blending.

DOES THE GENERATOR OF USED OIL TO BE BURNED FOR ENERGY RECOVERY (OTHER THAN CESQG) MIX THE USED OIL WITH HAZARDOUS WASTE? IF YES, THEN COMPLETE THE USED OIL CHECKLIST. YES NO

8. DOES THE FACILITY GENERATE ANY HAZARDOUS WASTE THAT IS RECLAIMED TO RECOVER ECONOMICALLY FEASIBLE AMOUNTS OF GOLD, SILVER, PLATINUM, PALLADIUM, IRIIDIUM, OSMIUM, RHODIUM, RUTHENIUM, OR ANY COMBINATION OF THESE? IF YES, COMPLETE THE METALS RECOVERY CHECKLIST AND LIST BELOW WHERE IT IS SENT. YES NO

9. DOES THE FACILITY GENERATE, TRANSPORT, STORE, COLLECT, RECLAIM SPENT LEAD-ACID BATTERIES? IF THE FACILITY STORES BATTERIES BEFORE RECLAIMING THEM, COMPLETE THE METALS RECOVERY CHECKLIST. YES NO

10. BASED ON THE ABOVE, THE FACILITY IS A:

- A. CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR
- B. SMALL QUANTITY GENERATOR
- C. **large quantity generator**
- D. PERMITTED TSD
- E. UNPERMITTED TSD (EXPLAIN)
- F. TRANSPORTER
- G. OTHER (EXPLAIN)

11. LIST EACH CONTAINER AND TANK ACCUMULATION AREA. SPECIFY THE NUMBER AND CAPACITY OF EACH TANK AND CONTAINER. INCLUDE SATELLITE ACCUMULATION AREAS AND VERIFY THAT ONLY 55 GALLONS OF ANY PARTICULAR HAZARDOUS WASTE CODE (OR ONE QUART OF ACUTELY TOXIC WASTE) IS IN THAT AREA.

LOCATION	NO. OF CONTAINERS	CONTENTS	CAPACITY
<i>Plant 1 - SA</i>	<i>1</i>	<i>Lab glass waste</i>	<i>55-gal</i>
	<i>1</i>	<i>Solvent waste</i>	<i>55-gal</i>
<i>Plant 4 - SA</i>	<i>1</i>	<i>Waste resin solution</i>	<i>55-gal</i>
<i>AA</i>	<i>>20</i>	<i>Various wastes</i>	<i>55-gal</i>

13. WASTE MANAGEMENT FLOW DIAGRAM: SKETCH A BRIEF BUT DETAILED FLOW DIAGRAM THAT INCLUDES HOW AND WHERE THE WASTE IS GENERATED, THE STEPS THROUGH A TREATMENT SYSTEM, THE STEPS THROUGH STORAGE INCLUDING SATELLITE ACCUMULATION AREAS. DO THIS FOR EACH WASTE STREAM INCLUDING EXCLUDED HAZARDOUS WASTE. INCLUDE WASTEWATER TREATMENT FACILITIES, VERIFY THE TYPE OF UNITS INCLUDED IN THE SYSTEM, AND ANY HAZARDOUS WASTE STREAMS GOING TO THE WWTP.

See attached "Process Flow Diagrams".

COMMENTS:

- a. *The facility employees approximately 130 employees.***
- b. *The facility has been preparing for and will be audited in March 2000 for ISO 14000 Certification.***
- c. *On September 23, 1999, the facility experienced an accidental release of styrene monomer to the City of Danville POTW. A copy of the "Spill Release Record & Checklist" and letter to the City of Danville are attached.***
- d. *The facility manages fluorescent light tubes as a universal waste and recycles the light tubes through Environmental Management, Greensboro, North Carolina.***
- e. *The facility has not made a formal evaluation of Subpart CC requirements, and it was recommended that such an evaluation be made and placed in the facility's files.***

4. CONTAINERS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATATION	REGULATION	YES	NO	NA	NC
264/5.171	SECTION A - USE AND MANAGEMENT				
	1. Are containers in good condition?	X			
264/5.172	SECTION B - COMPATIBILITY OF WASTE WITH CONTAINER				
	2. Is container made of a material that will not react with the waste which it stores?	X			
264/5.173	SECTION C - MANAGEMENT OF CONTAINERS				
	3. Is container always closed while holding hazardous waste?	X			
	4. Is container not opened, handled, or stored in a manner which may rupture it or cause it to leak?	X			
264/5.174	SECTION D - INSPECTIONS				
	5. Does owner/operator inspect containers at least weekly for leaks and deterioration?	X			
264/5.176	SECTION E - IGNITABLE AND REACTIVE WASTES				
	6. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?	X			
	PERMITTED FACILITIES ONLY				
264/5.177	SECTION F - INCOMPATIBLE WASTE				
	7. Are incompatible wastes or materials placed in the same containers?				
	8. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?				
	9. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?				
264.178	SECTION G - CLOSURE				
	10. Do container storage areas have a containment system?				
	11. At closure, were all hazardous wastes and associated residues removed from the containment system?				

COMMENTS:

5. GENERATORS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION A – MANIFEST				
262.20	1. Does generator ship waste off-site?	X			
262.20	2. Does generator use manifest?	X			
	a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month?)			X	
	NOTE: SQGs are only exempt if wastes are reclaimed. (See 262.20(e).)				
	1. If yes, does generator indicate this when sending waste to a TSD facility?			X	
Part 262 Appendix	b. If yes, does manifest include the following information?				
	1. Manifest document no.	X			
	2. Generator's name, mailing address, telephone no.	X			
	3. Generator EPA I.D. no.	X			
	4. Transporter Name(s) and EPA I.D. no.(s)	X			
	5. Facility name, address, and EPA I.D. no.	X			
	6. Alternate facility name, address, and EPA I.D. no.	X			
	7. Instructions to return to generator if undeliverable	X			
	8. Waste information required by DOT – shipping name, quantity (weight or vol.), containers (type and number)	X			
	9. Emergency information (optional) (special handling instructions, telephone no.)	X			
	10. Is the following certification on each manifest form?	X			
	¶This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable national and international regulations.¶				
262.40	11. Does generator retain copies of manifests? If yes, complete a through g. (262.23)	X			
	a. Did generator sign and date all manifests?	X			
	b. Did generator obtain handwritten signature and date of acceptance from initial transporter?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
262.40	c. Does generator retain one copy of manifest signed by generator and initial transporter?	X			
262.40	d. Do returned copies of manifest include facility owner/operator signature and date of acceptance?	X			
262.42	12. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago?	X			
	a. If no, has the generator filed an exception report?			X	
	b. Does the exception report include:				
	1. a legible copy of the Manifest for which the generator does not have confirmation of the delivery? And			X	
	2. a cover letter explaining the efforts taken to locate the shipment?			X	
262.11	SECTION B – HAZARDOUS WASTE DETERMINATION				
	3. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)?	X			
	4. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, TC)?	X			
	a. Does generator determine characteristics by testing or by applying knowledge of processes?	X			
	1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?	X			
262.11	5. Has the generator evaluated all solid wastes to determine whether the solid wastes are hazardous wastes?	X			
	SECTION C – PRETRANSPORT REQUIREMENTS				
262.30	6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)?	X			
	a. Are containers to be shipped leaking or corroding?		X		
	b. Complete Checklist 4. Containers to evaluate condition of containers.				
	c. Is there evidence of heat generation from incompatible wastes in the containers?		X		
262.31	7. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?	X			
262.32	8. Does generator mark each package in accordance with 49 CFR 172?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
262.32	9. Is each container of 110 gallons or less marked with the following label? HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.	X			
	a. Generator name(s) and address(es)	X			
	b. Manifest document No.	X			
262.33	10. Does generator have placards to offer to transporters?	X			
262.34	11. Accumulation time				
	a. Are containers used to temporarily store waste before transport?	X			
262.34(a)(2)	1. If yes, is each container clearly dated?	X			
262.34(a)(3)	2. If yes, is each container labeled or clearly marked with the words "Hazardous Waste?"	X			
262.34(c)(1)	12. Does the generator have satellite accumulation areas where up to 55 gallons of any one type of hazardous waste (HW) (1qt acutely HW) are accumulated? If yes,	X			
262.34 (c)(1)(ii)	a. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	X			
262.34(c)(1)	13. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,		X		
	a. Has the generator marked the excess amount with the date the excess amount began accumulating? And			X	
	b. Has the generator either removed the excess amount within three days of the date of excess accumulation or has the generator complied with all other provisions for accumulation areas. Namely, has the generator notified the Executive Director about the location of the accumulation area?			X	
262.40	SECTION D – RECORDKEEPING AND RECORDS				
	14. Does generator keep the following reports for 3 years?				
	a. Manifest or signed copies from designated facilities	X			
	b. Biennial reports	X			
	c. Exception reports	X			
	d. Test results	X			
	16. Where are the records kept (at facility or elsewhere)?	Records are kept at the facility.			
	SECTION E – SPECIAL CONDITIONS				
	17. Has the primary exporter received from or transported to a foreign source any hazardous waste?			X	
262.53	a. If yes, has he filed a notice with the Regional Administrator?			X	
262.54	b. Is this waste manifested and signed by a foreign consignee?			X	

40 CFR CITATION	REGULATION	YES	NO	NA	NC
262.54	c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?			X	
268	SECTION F – LDR REQUIREMENTS				
	18. Does the facility generate, transport, treat, store or dispose any land-restricted wastes?	X			
	19. Is land disposal of wastes occurring? If yes,		X		
	a. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR			X	
	b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X	
	c. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X	
268.5	22. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		X		
268.6	23. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X		
268.3	24. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X		
268.4	25. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X		
	26. If yes, complete Check Sheet 12. Surface Impoundments.				
	27. Is the facility treating waste in Tanks or Containers in order to meet applicable treatment standards under 268.40?		X		
268.7(a)(4)	28. If Yes, has the facility developed a Waste Analysis Plan?			X	
268.7(a)(4)(ii)	29. Has the Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity?			X	
268.7(a)(1)	30. Restricted wastes, which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	31. Did the notification include the following information:				
268.7(a)(1)(i)	a. EPA Hazardous Waste Number?	X			
268.7(a)(1)(ii)	b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?	X			
268.7(a)(1)(iii)	c. The manifest number associated with the shipment of waste? and	X			
268.7(a)(1)(v)	d. Waste analysis data, where available?	X			
268.7(a)(2)	32. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions set forth in 268.32 or RCRA section 3004(d)?			X	
	33. Did the notification include the following information:				
268.7(a)(2)(i)(A)	a. EPA Hazardous Waste Number?			X	
268.7(a)(2)(i)(B)	b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?			X	
268.7(a)(2)(i)(C)	c. The manifest number associated with the shipment of waste? And			X	
268.7(a)(2)(i)(D)	d. Waste analysis date, where available?			X	
268.7(a)(2)(ii)	34. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X	
268.7(a)(3)	35. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?		X		
268.7(a)(7)	36. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X			
	37. Is the generator storing land restricted waste? (For one year storage only)		X		

7. HEALTH & SAFETY CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/265.16(a)(1)	SECTION A - OUTLINE OF PERSONNEL TRAINING PROGRAM				
	1. Does the facility have a written training program?	X			
264/5.16(c) and (d)(3)	2. Does the program consist of:				
	a. strictly classroom instruction?		X		
	b. strictly on-the-job training?		X		
	c. classroom instruction AND on-the-job training?	X			
	3. Is an annual refresher course required for personnel whose positions at the facility are related to hazardous waste management?	X			
264/265.16(d)(1) and (2)	SECTION B - JOB TITLE/JOB DESCRIPTION				
	4. Is a job title provided for each employee whose position at the facility is related to hazardous waste management?	X			
	5. Is a job description provided for each employee whose position at the facility is related to hazardous waste management?	X			
264/265.16(a)(2)	SECTION C - TRAINING DIRECTOR				
	6. Is the training program directed by a person trained in hazardous waste management?	X			
264/265.16(a)(2)	SECTION D - RELEVANCE OF TRAINING TO JOB POSITION				
	7. Are facility personnel instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions?	X			
264/265.16(a)(3)	SECTION E - TRAINING AND EMERGENCY RESPONSE				
	8. Does the training program include the following emergency response procedures where applicable ?				
	a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?	X			
	b. Key parameters for automatic waste feed cut-off systems?	X			
	c. Procedures for utilizing communications or alarm systems?	X			
	d. Directions for responding to fires or explosions?	X			
	e. Procedures for groundwater contamination response?	X			
	f. Procedures for conducting shutdown operations?	X			
264/265.16(b), (d)(4) and (3)	SECTION F - IMPLEMENTATION OF TRAINING PROGRAM				
	9. Are all facility personnel trained within six months of their employment or assignment to the facility or transfer to a new position?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	10. Are facility personnel allowed to work unsupervised before their training program has been completed?		X		
	11. Are records maintained which document that the required training has been given to and completed by facility personnel?	X			
264/265.33	SECTION G - TESTING AND MAINTENANCE OF EQUIPMENT				
	12. Does the owner/operator test and maintain (as necessary to assure its proper operation in time of emergency) the following equipment:				
	a. All communications or alarm systems?	X			
	b. Fire protection equipment?	X			
	c. Spill control equipment?	X			
	d. Decontamination equipment?	X			
264/265.15	SECTION H - GENERAL INSPECTION REQUIREMENTS (PERMITTED FACILITIES ONLY)				
	13. Does the owner/operator maintain a written schedule at the facility for the inspection of:				
	a. Monitoring equipment?	X			
	b. Safety and emergency equipment?	X			
	c. Security devices?	X			
	d. Operating and structural equipment?	X			
	e. Types of problems with equipment:				
	1. Malfunction	X			
	2. Operator error	X			
	3. Discharges	X			
	14. Does the schedule identify the types of problems to look for?	X			
	15. Is the frequency of inspection based on the possible deterioration of equipment and the probability of incident?	X			
	16. Are areas subject to spills, such as loading and unloading areas, inspected daily?	X			
	17. Does the owner/operator maintain an inspection log? If yes, does the log include:	X			
	a. Date and time of inspection?	X			
	b. Name of inspector?	X			
	c. Notations of observations?	X			
	d. Date and nature of repairs or remedial actions?	X			
	18. Have any malfunctions or other problems not been remedied? (Summarize in comments section.)		X		
264/265.35	SECTION I - REQUIRED AISLE SPACE				
	19. Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and Decontamination equipment?	X			
	20. If aisle space is not maintained, has the owner/operator demonstrated to the Regional Administrator that the space is not needed?			X	
264/265.32	SECTION J - EQUIPMENT REQUIREMENTS				
	21. Is there evidence of fire, explosion, or contamination of the environment? If yes, explain in the comment section.		X		
	22. Is the facility equipped with the following:				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	a. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel?	X			
	b. A device such as a telephone (immediately available) or handheld two-way radio capable of summoning emergency assistance from police, fire, or state or local emergency response teams?	X			
	c. Portable fire extinguishers?	X			
	d. Fire control equipment (including special extinguishing equipment such as foam, inert gas, or dry chemical)?	X			
	e. Spill control equipment?	X			
	f. Decontamination equipment?	X			
	g. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	X			
264/265.17(a) and (b)	SECTION K – REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES				
	23. Does the facility handle ignitable or reactive waste? If yes:	X			
	a. Does the owner/operator take the following precautions to prevent accidental ignition or reaction of wastes: Separate and protect ignitable or reactive wastes from sources of ignition or reaction (open flames, smoking, cutting, welding, hot surfaces, frictional heat, static electrical or mechanical sparks, spontaneous ignition, and radiant heat?	X			
	24. Does the owner/operator confine smoking and open flames to specially designated locations, while ignitable or reactive waste is being handled?	X			
	25. Are "No Smoking" signs placed conspicuously wherever there is a hazard from ignitable or reactive waste?	X			
	26. Does the owner/operator have procedures in place to prevent accidental ignition or reaction of wastes?	X			
264/265.50 through §265.56	SECTION L – CONTINGENCY PLAN				
	27. Does the owner/operator have a Contingency Plan, or a Spill Prevention Control and Counter measures (SPCC) Plan, or some other emergency plan, that is amended for hazardous waste management?	X			
	28. Is a copy maintained at the facility?	X			
	29. Has a copy been submitted to all local police and fire departments, hospitals, and State and local emergency response teams?	X			
	30. Does the plan describe the control procedures taken in the event of a fire, explosion, or release?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	31. Does the plan describe how and when it will be implemented?	X			
	32. Does the plan describe arrangements agreed to by local police and fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	X			
	33. Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
	34. Is one person named as the primary coordinator?	X			
	35. Does the coordinator have the authority to commit the resources to carry out the emergency plan?	X			
	36. Does the plan physically describe and identify the location of all emergency equipment at the facility?	X			
	37. Does the plan include provisions to ensure that the equipment is cleaned and fit for its intended use before operations are resumed?	X			
	38. Does the plan include an evacuation plan for facility personnel?	X			
	39. Does the plan describe:				
	a. Signal(s) to be used to begin evacuation?	X			
	b. Evacuation routes?	X			
	c. Does the plan describe the methodology for immediate notification of:	X			
	1. Facility personnel?	X			
	2. State or local agencies with designated response roles?	X			
	40. Does the plan include procedures for identification of released materials?	X			
	41. Does the plan include procedures/criteria to assess possible hazards to human health and the environment that may result from the release, fire, or explosion?	X			
	42. Does the plan describe all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, reoccur, or spread to other hazardous waste at the facility?	X			
	43. Does the plan describe procedures to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment if the facility stops operation in response to a fire, explosion, or release?	X			
264/265.37	SECTION M - NECESSARY AGREEMENTS WITH LOCAL AUTHORITIES				
	44. Has the owner/operator made the following arrangements:				
	a. Familiarized police, fire departments, and emergency response teams with the layout of the facility and associated hazards?	X			
	b. Designated one police and fire department with primary emergency authority when more than one might respond?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	c. Agreements with State emergency response teams, contracts, and equipment supplies?	X			
	d. Familiarized local hospitals with the properties of waste handled at the facility and the types of injuries or illness that could result?	X			
	45. Where authorities decline to enter into such arrangements, has the owner/operator documented the refusal?			X	

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99215	29-Oct-99	Rineco	D001		Recovered/Wash Acetonitrile	9,986	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omni glow	CPPO
99215	29-Oct-99	Rineco	D001		Waste Isopar-H	801	Spent solvent from production process; Isopar-H.	Fuels Blending	Omni glow	CPPO
99214	26-Oct-99	Rineco	D001		Dryer Strippings	500	Ignitable solvent from dryer strippings; Isopar-H.	Fuels Blending	Omni glow	CPPO
99214	26-Oct-99	Rineco	D001		Waste Distilled Isopar-H	9,310	Ignitable spent solvent from water strippings; Isopar-H.	Fuels Blending	Omni glow	CPPO
99214	26-Oct-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,883	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omni glow	CPPO
99214	26-Oct-99	Rineco	D001		CPPO Filter Cake	302	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omni glow	CPPO
99214	26-Oct-99	Rineco	D001		Recovered/Wash Acetonitrile	11,860	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omni glow	CPPO
99213	04-Nov-99	Omni Southeaster n	D001	D018	Waste AGE/Cumene	1,850	Recovered raw materials from production process; AGE/Cumene.	Fuels Blending	Uniroyal	Trilene TE-141
99213	04-Nov-99	Omni Southeaster n	D001		Waste Cyclohexane	15,050	Recovered solvent from production process; Cyclohexane. Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Rheox	Rheolate 5000
99212	14-Oct-99	Rineco	D001		CPPO Filter Cake	615		Fuels Blending	Omni glow	CPPO
99212	14-Oct-99	Rineco	D001		Recovered/Wash Acetonitrile	12,388	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omni glow	CPPO
99212	14-Oct-99	Rineco	D001		Waste Isopar-H	357	Spent solvent from production process; Isopar-H.	Fuels Blending	Omni glow	CPPO
99212	14-Oct-99	Rineco	D001	D002	Crude CPPO Acid Wash	6,251	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omni glow	CPPO
99211	12-Oct-99	LWD	D001	F005	Waste Toluene & Water	1,704	Waste solvent from floor drains containing solids; Toluene, Water, Gantrez AN-169BF.	Fuels Blending	ISP	AN 169 BF

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99211	12-Oct-99	LWD	D001	F003	Waste Ethyl Acetate/Cyclohexane	865	Waste solvent from clean out containing solids; Stab 06, Cyclohexane, Ethyl Acetate, filters, etc.	Fuels Blending	ISP	Stabileze 06
99211	12-Oct-99	LWD	D001		Waste Spend Solvent	760	Waste solvent strippings from production process; Isopropyl Alcohol.	Fuels Blending	ISP	PVP/VA 60/40
99211	12-Oct-99	LWD	D001		Waste Ethanol	4,588	Waste Ethanol and Water from production process.	Fuels Blending	ISP	FX-64,SF-40
99210	07-Oct-99	Omni Southeaster n	D001		Hi Sol 10	402	Waste raw material from production process; Hi Sol 10	Fuels Blending	Danchem	N/A
99210	07-Oct-99	Omni Southeaster n	D001		Waste BDMA	385	Waste raw material from production process;Benzylidimethylamine.	Fuels Blending	Danchem	N/A
99209	08-Oct-99	Ecoflo	D001	D035	Waste FC-9436	400	Waste FC-9436 from tank truck loading process. Contains FC-9436, buckets, filters, sample bottles, etc.	Fuels Blending	Macdermid	FC-9436
99209	08-Oct-99	Ecoflo	D001		Eco-Cryl Waste	2,800	Waste material from production run containing Water, TEA, Glycol Ether, and Eco-Cryl.	Fuels Blending	Shell	Eco-Cryl
99206	01-Oct-99	Rineco	D001		CPPO Dryer Strippings	441	Waste dryer strippings containing Acetonitrile and Isopar-H.	Fuels Blending	Omni glow	CPPO
99206	01-Oct-99	Rineco	D001		Recovered/Wash Acetonitrile	7,140	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omni glow	CPPO
99206	01-Oct-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,821	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omni glow	CPPO
99204	24-Sep-99	Rineco	D001		Waste Isopar-H	1,187	Spent solvent from production process; Isopar-H. Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omni glow	CPPO
99204	24-Sep-99	Rineco	D001		CPPO Filter Cake	310		Fuels Blending	Omni glow	CPPO
99204	24-Sep-99	Rineco	D001		Recovered/Wash Acetonitrile	8,667	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omni glow	CPPO
99204	24-Sep-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,755	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omni glow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99191	26-Aug-99	Rineco	D001		Recovered/Wash Acetonitrile	5,988	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99191	26-Aug-99	Rineco	D001	D002	Crude CPPO Acid Wash	5,575	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99190	27-Aug-99	LWD	D001		Waste Ethanol	29,105	Waste Ethanol and Water from production process.	Fuels Blending	ISP	FX-64 & SF-40
99190	27-Aug-99	LWD	D001	F005	Waste Solvent	1,254	Waste solvent containing solids;Toluene and Gantrez AN169.	Fuels Blending	ISP	AN 169 BF
99190	27-Aug-99	LWD	D001	F003 F005	Spent Solvent	686	Spent solvent from production process; Toluene, Ethyl Acetate,Cyclohexane.	Fuels Blending	ISP	AN 169 BF
99187	19-Aug-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,220	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99187	19-Aug-99	Rineco	D001		Recovered/Wash Acetonitrile	6,678	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99187	19-Aug-99	Rineco	D001		CPPO Filter Cake	338	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99187	19-Aug-99	Rineco	D001		Waste Isopar-H	1,607	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99187	19-Aug-99	Rineco	D001		Waste Acetonitrile	334	Waste Acetonitrile from dryer strippings.	Fuels Blending	Omniglow	CPPO
99182	17-Aug-99	Omni Southeaster n	D001		Waste Aquaflex FX-64	11,580	Off-spec finished goods; Aquaflex FX-64.	Fuels Blending	ISP	Aquaflex FX-64
99179	10-Aug-99	Rineco	D001		Recovered/Wash Acetonitrile	10,093	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99179	10-Aug-99	Rineco	D001	D002	Crude CPPO Acid Wash	6,366	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons. Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process	Fuels Blending	Omniglow	CPPO
99179	10-Aug-99	Rineco	D001		CPPO Filter Cake	328	operations.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99174	03-Aug-99	Rineco	D001		Waste Isopar-H	1,354	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99174	03-Aug-99	Rineco	D001		CPPO Filter Cake	276	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99174	03-Aug-99	Rineco	D001		Recovered/Wash Acetonitrile	9,743	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99174	03-Aug-99	Rineco	D001	D002	Crude CPPO Acid Wash	4,465	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99172	19-Jul-99	ENSCO	D001		Waste MEK	5,185	Waste solvent from production process;Methyl Ethyl Ketone.	Fuels Blending	Novartis	Prodiamine
99171	21-Jul-99	Rineco	D001	F003	Waste Butanol	2,858	Ignitable spent solvent from production process; Butanol.	Fuels Blending	Ciba Geigy	FS-042
99170	21-Jul-99	Rineco	D001		Recovered/Wash Acetonitrile	14,892	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99170	21-Jul-99	Rineco	D001	D002	Crude CPPO Acid Wash	7,162	Water split from separation process;water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99170	21-Jul-99	Rineco	D001		CPPO Filter Cake	292	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99167	08-Jul-99	Rineco	D001		Waste Distilled Isopar-H	779	Ignitable spent solvent from water stripping; Isopar-H.	Fuels Blending	Omniglow	CPPO
99167	08-Jul-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,705	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99167	08-Jul-99	Rineco	D001		Recovered/Wash Acetonitrile	8,245	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99167	08-Jul-99	Rineco	D001		CPPO Filter Cake	397	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99164	30-Jun-99	Rineco	D001		Waste Isopar-H	1,167	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99164	30-Jun-99	Rineco	D001	D002	Crude CPPO Acid Wash	2,496	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99164	30-Jun-99	Rineco	D001		Recovered/Wash Acetonitrile	9,811	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99163	25-Jun-99	Rineco	D001	F003	Waste Butanol	14,804	Ignitable spent solvent from production process; Butanol.	Fuels Blending	Ciba Geigy	FS-042
99159	18-Jun-99	Rineco	D001		Waste Isopar-H	600	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99159	18-Jun-99	Rineco	D001		CPPO Filter Cake	330	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99159	18-Jun-99	Rineco	D001		Recovered/Wash Acetonitrile	11,388	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99159	18-Jun-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,814	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99156	16-Jun-99	Ecoflo	D001	D035	Waste FC-9436	950	Waste FC-9436 from tank truck loading process. Contains FC-9436, buckets, filters, sample bottles, etc.	Fuels Blending	Danchem	FC-9436
99156	16-Jun-99	Ecoflo	D001	F005,D035	Waste MEK	511	Waste MEK from from the production of FC-9436; MEK & FC-9436. Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Danchem	FC-9436
99151	10-Jun-99	Rineco	D001		CPPO Filter Cake	263		Fuels Blending	Omniglow	CPPO
99151	10-Jun-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,304	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99151	10-Jun-99	Rineco	D001		Waste Distilled Isopar-H	1,600	Ignitable spent solvent from water strippings; Isopar-H.	Fuels Blending	Omniglow	CPPO
99151	10-Jun-99	Rineco	D001		Recovered/Wash Acetonitrile	5,679	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99149	03-Jun-99	Rineco	D001		Recovered/Wash Acetonitrile	14,244	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Treatment Method	Combo30	Combo32
99149	03-Jun-99	Rineco	D001		CPPO Filter Cake	681		Fuels Blending	Omniglow	CPPO
99149	03-Jun-99	Rineco	D001		Waste Isopar H	374	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99149	03-Jun-99	Rineco	D001	D002	Crude CPPO Acid Wash	5,754	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99144	25-May-99	Rineco	D001		Waste Isopar H	396	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	PTCSA
99144	25-May-99	Rineco	D001		Recovered/Wash Acetonitrile	10,060	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99144	25-May-99	Rineco	D001	D002	Crude CPPO Acid Wash	5,159	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99143	13-May-99	Rineco	D001	D002	Crude CPPO Acid Wash	2,649	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99143	13-May-99	Rineco	D001		Reactor Wash	5,592	Ignitable spent solvent from reactor wash; acetonitrile.	Fuels Blending	Omniglow	CPPO
99143	13-May-99	Rineco	D001		CPPO Filter Cake	247	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99143	13-May-99	Rineco	D001		Mother Liquor	10,009	Ignitable spent solvents from reactor cleaning operations containing isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99143	13-May-99	Rineco	D001		Recovered/Wash Acetonitrile	8,171	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99142	06-May-99	Rineco	D001	F003	Waste Butanol	4,920	Ignitable spent solvent from production process; Butanol.	Fuels Blending	Ciba Geigy	FS-042
99141	06-May-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,983	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99141	06-May-99	Rineco	D001		CPPO Filter Cake	278	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99141	06-May-99	Rineco	D001		Recovered/Wash Acetonitrile	9,703	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99141	06-May-99	Rineco	D001		Waste Isopar-H	1,121	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99141	06-May-99	Rineco	D001		Reactor Wash	1,255	Ignitable spent solvent from reactor wash; acetonitrile.	Fuels Blending	Omniglow	CPPO
99141	06-May-99	Rineco	D001		Dryer Strippings	362	Ignitable solvent from dryer strippings; Isopar-H.	Fuels Blending	Omniglow	CPPO
99140	04-May-99	Ecoflo	D001	F003,F005	Waste Solvent	2,663	Ignitable spent solvents from reactor cleaning operations, production strippings, and/or distillation; Methanol.	Fuels Blending	Danchem	Various
99140	04-May-99	Ecoflo	D001	F003,F005	Waste FC-9436	850	Waste FC-9436 from tanker loading containing filters, buckets, etc.	Fuels Blending	Danchem	FC-9436
99139	29-Apr-99	Omni Southeaster n	D001		Waste Binder LP	400	Ignitable off spec. commercial chemical products	Fuels Blending	HDC	Binder LP
99139	29-Apr-99	Omni Southeaster n	D001	D035	Waste FC-9436	23,250	Ignitable off spec. commercial chemical products; MEK.	Fuels Blending	Danchem	FC-9436
99139	29-Apr-99	Omni Southeaster n	D001		IPA Strippings	7,288	Ignitable solvent from production strippings; Isopropyl Alcohol and water.	Fuels Blending	McWhorter	177 727
99137	22-Apr-99	Rineco	D001	F003	Waste Butanol	4,200	Ignitable spent solvent from production process; Butanol.	Fuels Blending	Ciba Geigy	FS-042
99136	22-Apr-99	Rineco	D001		Reactor Wash	2,025	Ignitable spent solvent from reactor washing; acetonitrile.	Fuels Blending	Omniglow	CPPO
99136	22-Apr-99	Rineco	D001		Waste Distilled Isopar-H	1,050	Ignitable spent solvent from water stripping; Isopar-H.	Fuels Blending	Omniglow	CPPO
99136	22-Apr-99	Rineco	D001		CPPO Filter Cake	480	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99136	22-Apr-99	Rineco	D001	D002	Crude CPPO Acid Wash	4,863	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99136	22-Apr-99	Rineco	D001		Recovered /Wash Acetonitrile	7,508	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99135	08-Apr-99	LWD	D001	F003,F005	Waste Ethyl Acetate/Cyclohexane	1,330	Spent solvent from production process; Ethyl Acetate and Cyclohexane.	Fuels Blending	ISP	Stab 06
99135	08-Apr-99	LWD	D001	F005	Waste Toluene and Solids	7,061	Waste Toluene containing co-polymer solids.	Fuels Blending	ISP	AN 169 BF
99134	07-Apr-99	Rineco	D001	F003	Waste Butanol	1,050	Ignitable spent solvent from production process; Butanol.	Fuels Blending	Ciba Geigy	FS-042
99133	07-Apr-99	Rineco	D001		Recovered/Wash Acetonitrile	9,122	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99133	07-Apr-99	Rineco	D001		Waste Isopar-H	376	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99133	07-Apr-99	Rineco	D001	D002	Crude CPPO Acid Wash	2,649	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99133	07-Apr-99	Rineco	D001		Waste Distilled Isopar-H	2,912	Ignitable spent solvent from water stripping; Isopar-H.	Fuels Blending	Omniglow	CPPO
99133	07-Apr-99	Rineco	D001		Reactor Wash & Dryer Strippings	1,582	Ignitable spent solvent from reactor wash & dryer strippings; acetonitrile.	Fuels Blending	Omniglow	CPPO
99132	31-Mar-99	Rineco	D001	F003	Waste Butanol	22,980	Ignitable spent solvent from production process; Butanol.	Fuels Blending	Ciba Geigy	FS-042
99130	23-Mar-99	Rineco	D001	D002	Crude CPPO Acid Wash	6,640	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99130	23-Mar-99	Rineco	D001		Reactor Wash	1,360	Ignitable spent solvent from reactor wash; acetonitrile.	Fuels Blending	Omniglow	CPPO
99130	23-Mar-99	Rineco	D001		CPPO Filter Cake	558	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99130	23-Mar-99	Rineco	D001		Recovered/Wash Acetonitrile	5,323	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99126	11-Mar-99	Rineco	D001	D002	Crude CPPO Acid Wash	3,398	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99126	11-Mar-99	Rineco	D001		CPPO Filter Cake	329	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99126	11-Mar-99	Rineco	D001		Reactor Wash/Dryer Strippings	3,040	Ignitable spent solvent from reactor wash and/or dryer strippings; Acetonitrile.	Fuels Blending	Omniglow	CPPO
99126	11-Mar-99	Rineco	D001		Waste Isopar-H	1,157	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99126	11-Mar-99	Rineco	D001		Recovered/Wash Acetonitrile	9,524	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99124	09-Mar-99	Ecoflo	D001		Waste Pseudocumene	860	Waste pseudocumene from distillation; production of PMA-50	Fuels Blending	Danchem	PMA 50/70
99124	09-Mar-99	Ecoflo	D001		Water strippings	725	Waste water strippings of Pseudocumene.	Fuels Blending	Danchem	PMA 50/70
99124	09-Mar-99	Ecoflo	D001	F003,F005	Waste FC-9436	375	Waste FC-9436 from tanker loading; MEK, buckets, bottles, etc.	Fuels Blending	Danchem	FC-9436
99124	09-Mar-99	Ecoflo	D001		Waste Trilene	11,520	Waste Trilene from reactor upset; Trilene and Sodium Metabisulfite.	Fuels Blending	Danchem	Trilene TE-141
99120	25-Feb-99	Rineco	D001		Reactor Wash	1,360	Ignitable spent solvent from reactor wash; acetonitrile.	Fuels Blending	Omniglow	CPPO
99120	25-Feb-99	Rineco	D001		CPPO Filter Cake	336	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99120	25-Feb-99	Rineco	D001	D002	Crude CPPO Acid Wash	4,559	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99120	25-Feb-99	Rineco	D001		Waste Isopar-H	851	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99120	25-Feb-99	Rineco	D001		Recovered/Wash Acetonitrile	6,750	Ignitable spent solvent from product washing and recovery; Acetonitrile.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99115	22-Feb-99	Omni Southeaster n	D001		Waste Water	3,895	Waste water strippings containing Pseudocumene.	Fuels Blending	Danchem	PMA-50
99114	12-Feb-99	Rineco	D001	F003	Waste Butanol	1,750	Ignitable spent solvent from production process; Butanol.	Fuels Blending	Ciba Geigy	FS-042
99113	12-Feb-99	Rineco	D001		Acetonitrile Reactor Wash	1,332	Ignitable spent solvent from reactor wash; acetonitrile.	Fuels Blending	Omniglow	CPPO
99113	12-Feb-99	Rineco	D001		CPPO Filter Cake	251	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99113	12-Feb-99	Rineco	D001		Waste Isopar-H	406	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99113	12-Feb-99	Rineco	D001		Recovered/Wash Acetonitrile	14,666	Ignitable spent solvent from product washing & recovery; Acetonitrile.	Fuels Blending	Omniglow	CPPO
99113	12-Feb-99	Rineco	D001	D002	Crude CPPO Acid Wash	2,598	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99112	02-Feb-99	Rineco	D001	F003	Waste Butanol	28,583	Ignitable spent solvent from production process; Butanol.	Fuels Blending	Ciba Geigy	FS-042
99109	26-Jan-99	Ecoflo	D001		Waste Solids	400	High solid liquid waste from production process; Petroleum Distillates.	Fuels Blending	Rheox	MPA-3000
99109	26-Jan-99	Ecoflo	D001		PMA-50 Low Boiler	400	Waste solvent from production process; Acetone and Xylene.	Fuels Blending	Danchem	PMA-50
99109	26-Jan-99	Ecoflo	D001		Waste K-sperse	3,000	Recovered solvent from production process; Heptane.	Fuels Blending	King Ind.	K-Sperse
99109	26-Jan-99	Ecoflo	D001	F003,F005	Waste FC-9436 Trash	800	Waste finished product and trash from tanker loading; FC-9436.	Fuels Blending	Macdermid	FC-9436
99109	26-Jan-99	Ecoflo	D001		Waste Water	2,800	Waste water containing Pseudocumene.	Fuels Blending	Danchem	PMA-50
99107	21-Jan-99	Rineco	D001		Recovered/Wash Acetonitrile	4,810	Ignitable spent solvent from product washing & recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99107	21-Jan-99	Rineco	D001		Acetonitrile Reactor Wash	2,692	Ignitable spent solvent from product washing; acetonitrile.	Fuels Blending	Omniglow	CPPO
99107	21-Jan-99	Rineco	D001		Waste Isopar-E	1,266	Ignitable spent solvent from product washing; Isopar-E.	Fuels Blending	Omniglow	CPPO
99107	21-Jan-99	Rineco	D001		Dryer Strippings	342	Ignitable solvent from dryer strippings; Isopar-H.	Fuels Blending	Omniglow	CPPO
99107	21-Jan-99	Rineco	D001		Mother Liquor	1,561	Ignitable spent solvents from reactor cleaning operations containing isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99107	21-Jan-99	Rineco	D001		Waste Distilled Isopar-H	1,360	Ignitable spent solvent from water stripping; Isopar-H.	Fuels Blending	Omniglow	CPPO
99107	21-Jan-99	Rineco	D001	D002	Crude CPPO Acid Wash	5,779	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99107	21-Jan-99	Rineco	D001		CPPO Filter Cake	373	Solids containing flammable liquid (acetone, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99103	07-Jan-99	Rineco	D001		CPPO Filter Cake	315	Solids containing flammable liquid (acetone, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99103	07-Jan-99	Rineco	D001		Crude Mother Liquor	11,987	Ignitable spent solvents from process operations containing isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99103	07-Jan-99	Rineco	D001	D002	Crude CPPO Acid Wash	4,523	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99103	07-Jan-99	Rineco	D001		CPPO Acetonitrile Wash	6,409	Ignitable spent solvent from product washing; acetonitrile.	Fuels Blending	Omniglow	CPPO
99102	05-Jan-99	Rineco	D001		Waste Isopar_H	362	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99102	05-Jan-99	Rineco	D001		Acetonitrile Reactor Wash	2,374	Ignitable spent solvent from reactor washing; acetonitrile.	Fuels Blending	Omniglow	CPPO
99102	05-Jan-99	Rineco	D001		CPPO Acetonitrile Wash	9,355	Ignitable spent solvent from product washing; acetonitrile.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99167	08-Jul-99 Rineco		D002		Sulfuric Acid Split	1,100	Corrosive water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99164	30-Jun-99 Rineco		D002		Sulfuric and Water Split	2,200	Corrosive water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99162	01-Jul-99 EEI		D002		Waste 4B Acid	5,937	Waste PT Sulfate containing water ,PT, 4B Acid, and Sulfuric Acid.	Fuels Blending	Danchem	4B
99159	18-Jun-99 Rineco		D002		Corrosive wash water	1,120	Corrosive water from Reactor Process; Sulfuric Acid & Water.	Fuels Blending	Omniglow	CPPO
99151	10-Jun-99 Rineco		D002		Corrosive Wash Water	1,070	Corrosive water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99149	03-Jun-99 Rineco		D002		Corrosive Wash Water	2,178	Corrosive water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99144	25-May-99 Rineco		D002		Corrosive Wash Water	1,074	Corrosive water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99141	06-May-99 Rineco		D002		Corrosive wash water	1,100	Corrosive water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99136	22-Apr-99 Rineco		D002		Corrosive Wash Water	1,145	Corrosive water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99126	11-Mar-99 Rineco		D002		Corrosive Wash Water	3,454	Corrosive water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99120	25-Feb-99 Rineco		D002		Corrosive Wash Water	2,438	Corrosive Water from reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99102	05-Jan-99 Rineco		D002		Corrosive Reactor Water Waste	3,325	Corrosive Water from Reactor Process; Sulfuric Acid & Water	Fuels Blending	Omniglow	CPPO
99156	16-Jun-99 Ecoflo		D035		Waste FC-9436	1,420	Waste solids from FC9436 spill clean-up.	Fuels Blending	Danchem	FC-9436
99234	20-Dec-99 Ecoflo		F003		Waste Xylene	3,200	Spent solvent from basin skimmings; Xylene and Water.	Fuels Blending	Danchem	PMA-50

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99234	20-Dec-99	Ecoflo	F003		Waste Solvents	400	Waste solvents from lab; Methanol, MEK, Acetone, etc.	Fuels Blending	Danchem	Lab Waste
99234	20-Dec-99	Ecoflo	F003		Waste Methanol	400	Spent solvent from reactor cleaning; Methanol.	Fuels Blending	Danchem	N/A
99228	29-Nov-99	Omni Southeaster n	F003	D001	Waste Solvents	10,727	Spent solvents from production process; Xylene and Acetone.	Fuels Blending	Danchem	PMA-50
99228	29-Nov-99	Omni Southeaster n	F003		Waste Xylene	9,490	Waste solvent from production process; Xylene.	Fuels Blending	Danchem	PMA-50
99227	23-Nov-99	Ecoflo	F003	F005	Waste Solvents	400	Waste solvents from lab; Methanol, MEK, Acetone, etc.	Fuels Blending	Danchem	N/A
99227	23-Nov-99	Ecoflo	F003		Waste Methanol	2,800	Spent solvent from reactor cleaning; Methanol.	Fuels Blending	Danchem	N/A
99182	17-Aug-99	Omni Southeaster n	F003	D001	Waste Solvents	1,420	Waste solvents from reactor clean-out; Cyclohexane and MEK.	Fuels Blending	Rheox	Rheolate 5000
99182	17-Aug-99	Omni Southeaster n	F003	D001	Waste Solvents	560	Waste solvents from distillation during the production of PMA-50; Acetone and Xylene.	Fuels Blending	Rohm and Haas	PMA 50
99169	22-Jul-99	Omni Southeaster n	F003		Waste Xylene	14,046	Waste solvent from production process; Xylene.	Fuels Blending	Danchem	PMA 50
99140	04-May-99	Ecoflo	F003	F005	Waste Solvents	450	Ignitable spent solvents from lab and production samples; MEK, methanol, toluene, cyclohexane, etc.	Fuels Blending	Danchem	Various
99115	22-Feb-99	Omni Southeaster n	F003	D001	Waste Solvents	450	Waste mixed solvents from lab samples; Methanol, Isopropyl Alcohol, etc.	Fuels Blending	Danchem	NA
99115	22-Feb-99	Omni Southeaster n	F003		Waste Xylene	1,685	Waste solvent from production process; Xylene.	Fuels Blending	Danchem	PMA_50
99115	22-Feb-99	Omni Southeaster n	F003		Waste t-Butyl Alcohol & Acetone	4,707	Ignitable spent solvent from production process; t-Butyl Alcohol and Acetone.	Fuels Blending	Uniroyal	Trilene
99109	26-Jan-99	Ecoflo	F003		Waste Methanol	2,400	Spent solvent from reactor clean-out; Methanol.	Fuels Blending	Danchem	GHI-101

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99184	17-Aug-99	Ecoflo	F003,F005	D001	Waste FC-9436	500	Waste FC-9436 from tanker loading containing filters, buckets, etc.	Fuels Blending	Macdermid	FC-9436
99182	17-Aug-99	Omni Southeaster n	F003,F005	D001	Waste PMA-50	855	Waste from production low boilers;Acetone,Xylene,and t-Butyl Alcohol.	Fuels Blending	Rohm and Haas	PMA-50
99182	17-Aug-99	Omni Southeaster n	F003,F005	D001	Waste Solvents	450	Mixed waste solvents from lab; Acetone, MEK,etc.	Fuels Blending	Danchem	N/A
99209	08-Oct-99	Ecoflo	F005		Waste MEK	15,200	Waste solvent from reactor wash and product strippings; MEK.	Fuels Blending	McWhorter	154-776
99202	23-Sep-99	Ecoflo	F005		Waste MEK	14,400	Waste from pre-cleaning of reactor; MEK and Water.	Fuels Blending	McWhorter	154-776
99202	23-Sep-99	Ecoflo	F005		Waste MEK	14,400	Waste strippings from production process; Methyl Ethyl Ketone and water.	Fuels Blending	McWhorter	154-776
99182	17-Aug-99	Omni Southeaster n	F005		Waste MEK	6,210	Waste MEK from reactor clean-out.	Fuels Blending	Rheox	Rheolate 5000
99169	22-Jul-99	Omni Southeaster n	F005	F003	Waste Xylene and Acetone	6,460	Waste solvents from production process; Xylene and Acetone.	Fuels Blending	Danchem	PMA 50
99140	04-May-99	Ecoflo	F005		Waste Solvent	375	Ignitable spent solvents from parts cleaning operations; MEK.	Fuels Blending	Danchem	FC-9436
99109	26-Jan-99	Ecoflo	F005	D001	Reactor Wash Solvent	10,800	Waste solvent from reactor clean-outs; MEK, Ethanol, IPA.	Fuels Blending	HDC	Various
						1,022,105				
99235	28-Dec-99	LWD	D001		Waste Heptane Liquid Solids	302	Waste solids containing Heptane & plastic/fiber filters, etc.	Incineration	ISP	ACP-1135
99171	21-Jul-99	Rineco	D001	F003	Empty drums and liners	46	Empty drum liners containing residue wet FS-042.	Incineration	Ciba Geigy	FS-042

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99163	25-Jun-99	Rineco	D001	F003	Empty drums and liners	39	Empty drums and liners containing a residue flammable solid; FS-042.	Incineration	Ciba Geigy	FS-042
99154	14-Jun-99	LWD	D001	F003,F005	Waste Toluene Liquid Solids	1,520	Waste solids containing Toluene and/or absorbent socks,pillows,pads, etc.	Incineration	ISP	AN 169 BF
99153	14-Jun-99	LWD	D001	F003,F005	Waste Acetone	23,390	Ignitable spent solvent from production process; Acetone.	Incineration	ISP	AN 169 BF
99142	06-May-99	Rineco	D001	F003	Empty drums and liners	159	Empty drums and liners containing a residue flammable solid; FS-042.	Incineration	Ciba Geigy	FS-042
99138	19-Apr-99	LWD	D001		Waste Vinyl Methyl Ether	25,260	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99137	22-Apr-99	Rineco	D001	F003	Empty drums and liners	75	Empty drums and liners containing a residue flammable solid; FS-042.	Incineration	Ciba Geigy	FS-042
99135	08-Apr-99	LWD	D001		Waste Heptane Liquid Solids	900	Waste solids containing Heptane & plastic/fiber filters, etc.	Incineration	ISP	ACP-1135
99135	08-Apr-99	LWD	D001	F003,F005	Waste Toluene Liquid Solids	1,500	Waste solids containing Toluene and/or absorbent socks,pillows,pads, etc.	Incineration	ISP	AN 169 BF
99132	31-Mar-99	Rineco	D001	F003	Empty drums and liners	1,086	Empty drums and liners containing a residue flammable solid; FS-042.	Incineration	Ciba Geigy	FS-042
99129	17-Mar-99	LWD	D001		Waste Vinyl Methyl Ether	20,480	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99128	13-Mar-99	LWD	D001		Waste Vinyl Methyl Ether	29,320	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99127	09-Mar-99	LWD	D001		Waste Vinyl Methyl Ether	16,480	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99124	09-Mar-99	Ecoflo	D001	D002	Waste Acetic Acid	2,275	Waste acetic acid from Trilene production.	Incineration	Uniroyal	Trilene
99124	09-Mar-99	Ecoflo	D001		Waste PMA-50	2,164	PMA-50 low boiler waste containing Acetone and Pseudocumene.	Incineration	Danchem	PMA 50/70

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99123	05-Mar-99	LWD	D001		Waste Vinyl Methyl Ether	26,980	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99122	01-Mar-99	LWD	D001		Waste Vinyl Methyl Ether	24,780	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99121	24-Feb-99	LWD	D001		Waste Vinyl Methyl Ether	9,020	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99118	17-Feb-99	LWD	D001		Waste Vinyl Methyl Ether	22,560	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99117	12-Feb-99	LWD	D001		Waste Vinyl Methyl Ether	16,940	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99116	09-Feb-99	LWD	D001		Waste Vinyl Methyl Ether	25,080	Ignitable spent solvent from production process; Vinyl Methyl Ether.	Incineration	ISP	AN 169 BF
99111	26-Jan-99	LWD	D001		Waste Vinyl Methyl Ether	24,240	Ignitable spent solvent from production process; Vinyl Methyl Ether.	Incineration	ISP	AN 169 BF
99110	20-Feb-99	LWD	D001		Waste Vinyl Methyl Ether	23,580	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
99108	22-Jan-99	LWD	D001		Waste Vinyl Methyl Ether	21,880	Ignitable spent solvent from production process; Vinyl Methyl Ether.	Incineration	ISP	AN 169 BF
99106	17-Jan-99	LWD	D001		Waste Vinyl Methyl Ether	19,780	Ignitable spent solvent from production process; Vinyl Methyl Ether.	Incineration	ISP	AN 169 BF
99105	12-Jan-99	LWD	D001		Waste Vinyl Methyl Ether	23,920	Ignitable spent solvent from production process; Vinyl Methyl Ether.	Incineration	ISP	AN 169 BF
99104	08-Jan-99	LWD	D001		Waste Vinyl Methyl Ether	14,880	Ignitable spent solvent from production process; Vinyl Methyl Ether.	Incineration	ISP	AN 169 BF
99101	04-Jan-99	LWD	D001		Waste Vinyl Methyl Ether	22,020	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Incineration	ISP	AN 169 BF
01259	25-Jan-99	Ecoflo	D001,F002,D002		Lab Pack R&D	500	Lab packs from R & D containing samples bottles of commercial, finished, or off-spec samples from testing.	Incineration	Danchem	Lab

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99207	01-Oct-99	Rineco	D002		Waste Sulfuric Acid	2,190	Corrosive water from Reactor Process; Sulfuric Acid & Water	Neutralization	OmniGlow	CPPO
99205	24-Sep-99	Rineco	D002		Waste Sulfuric Acid	1,100	Corrosive water from Reactor Process; Sulfuric Acid & Water	Neutralization	OmniGlow	CPPO
99201	17-Sep-99	Rineco	D002		Waste Sulfuric Acid	2,277	Corrosive water from Reactor Process; Sulfuric Acid & Water	Neutralization	OmniGlow	CPPO
99199	10-Sep-99	Rineco	D002		Waste Sulfuric Acid	2,160	Corrosive water from Reactor Process; Sulfuric Acid & Water	Neutralization	OmniGlow	CPPO
99196	03-Sep-99	Rineco	D002		Waste Sulfuric Acid	2,177	Corrosive water from Reactor Process; Sulfuric Acid & Water	Neutralization	OmniGlow	CPPO
99191	26-Aug-99	Rineco	D002		Waste Sulfuric Acid	2,244	Corrosive water from Reactor Process; Sulfuric Acid & Water	Neutralization	OmniGlow	CPPO
99189	19-Aug-99	Rineco	D002		Waste Sulfuric Acid	2,174	Corrosive water from Reactor Process; Sulfuric Acid & Water	Neutralization	OmniGlow	CPPO
99181	10-Aug-99	Rineco	D002		Waste Sulfuric Acid	1,085	Corrosive water from Reactor Process; Sulfuric Acid & Water	Neutralization	OmniGlow	CPPO
						19,926				
99239	27-Dec-99	ISP	D001		Waste Vinyl Methyl Ether	29,400	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	Gantrez AN169BF
99233	10-Dec-99	ISP	D001		Waste Vinyl Methyl Ether	16,340	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	Gantrez AN169BF
99197	09-Sep-99	ISP	D001		Waste Vinyl Methyl Ether	17,800	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99195	01-Sep-99	ISP	D001		Waste Vinyl Methyl Ether, Inhibited	20,080	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99193	28-Aug-99	ISP	D001		Waste Vinyl Methyl Ether, Inhibited	7,660	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF

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99192	24-Aug-99	ISP	D001		Waste Vinyl Methyl Ether, Inhibited	15,740	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99186	21-Aug-99	ISP	D001		Waste Vinyl Methyl Ether, Inhibited	14,380	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99185	16-Aug-99	ISP	D001		Waste Vinyl Methyl Ether, Inhibited	16,200	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99183	12-Aug-99	ISP	D001		Waste Vinyl Methyl Ether<inhibited	13,380	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99180	08-Aug-99	ISP	D001		Waste Vinyl Methyl Ether	19,620	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99178	03-Aug-99	ISP	D001		Waste Vinyl Methyl Ether	22,160	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99175	30-Jul-99	ISP	D001		Waste Vinyl Methyl Ether	11,160	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99173	26-Jul-99	ISP	D001		Waste Vinyl Methyl Ether	20,940	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99168	05-Jul-99	ISP	D001		Waste Vinyl Methyl Ether	20,640	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99166	01-Jul-99	ISP	D001		Waste Vinyl Methyl Ether	22,820	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99165	27-Jun-99	ISP	D001		Waste Vinyl Methyl Ether	14,300	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99161	23-Jun-99	ISP	D001		Waste Vinyl Methyl Ether	18,460	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99160	18-Jun-99	ISP	D001		Waste Vinyl Methyl Ether	17,820	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99157	14-Jun-99	ISP	D001		Waste Vinyl Methyl Ether	22,860	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF

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99155	09-Jun-99	ISP	D001		Waste Vinyl Methyl Ether	12,900	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99150	05-Jun-99	ISP	D001		Waste Vinyl Methyl Ether	20,360	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99148	01-Jun-99	ISP	D001		Waste Vinyl Methyl Ether	19,940	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99147	25-May-99	ISP	D001		Waste Vinyl Methyl Ether	26,980	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
99145	21-May-99	ISP	D001		Waste Vinyl Methyl Ether	18,600	Ignitable spent solvent from production process; Vinyl Methyl Ether..	Reclamation	ISP	AN 169 BF
78563	09-Sep-99	Safety Kleen	D001	D039	Waste from parts cleaner	250	Ignitable spent petroleum naphtha from parts cleaning system.	Reclamation	Danchem	Petroleum N.
73942	08-Nov-99	Safety Kleen	D001	D039	Waste from parts cleaner	250	Ignitable spent petroleum naphtha from parts cleaning system.	Reclamation	Danchem	Petroleum N.
66971	22-Jul-99	Safety Kleen	D001	D039	Waste from parts cleaner	250	Ignitable spent petroleum naphtha from parts cleaning system.	Reclamation	Danchem	Petroleum N.
49267	30-Mar-99	Safety Kleen	D001	D039	Waste from parts cleaner	500	Ignitable spent petroleum naphtha from parts cleaning system.	Reclamation	Danchem	Maint.
37722	20-May-99	Safety Kleen	D001	D039	Waste from parts cleaner	250	Ignitable spent petroleum naphtha from parts cleaning system.	Reclamation	Danchem	Petroleum N.
						442,040				
99172	19-Jul-99	ENSCO	NH1		Empty drum liners	38	Empty drum liners with prodiamine residue.		Novartis	Prodiamine
99237	30-Dec-99	Rineco	NH1		Waste Still Bottoms	3,585	Non-Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99234	20-Dec-99	Ecoflo	NH1		Waste Eco-Cryl	400	Waste Eco-Cryl from production sampling process.	Fuels Blending	DanChem	Eco-Cryl
99229	08-Dec-99	Rineco	NH1		CPPO Wash Water	4,500	Non-Regulated Waste Water.	Fuels Blending	Omniglow	CPPO
99228	29-Nov-99	Omni Southeastern	NH1		Waste TA-HCL	2,645	Waste TA-HCL filtrate water from production process.	Fuels Blending	Angus	TA-HCL
99227	23-Nov-99	Ecoflo	NH1		Ethylene Glycol	5,200	Waste Ethylene Glycol and water from spill clean-up.	Fuels Blending	Danchem	N/A
99227	23-Nov-99	Ecoflo	NH1		Waste Eco-Cryl	400	Waste Eco-Cryl containing water and filters.	Fuels Blending	Shell	Eco-Cryl
99226	23-Nov-99	Rineco	NH1		CPPO Wash Water	1,350	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99221	16-Nov-99	Rineco	NH1		Waste Still Bottoms	6,757	Non-Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO
99221	16-Nov-99	Rineco	NH1		CPPO Wash Water	1,800	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99218	09-Nov-99	Rineco	NH1		Wash Water/Bicarb Split	14,289	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99215	29-Oct-99	Rineco	NH1		Wash Water/Bicarb Split	14,110	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99214	26-Oct-99	Rineco	NH1		CPPO Wash Water	2,700	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99212	14-Oct-99	Rineco	NH1		CPPO Wash Water	4,500	Non-Regulated Waste Water	Fuels Blending	Omniglow	CPPO
99211	12-Oct-99	LWD	NH1		Waste Oil	1,960	Waste oil from CP01.	Fuels Blending	ISP	N/A
99210	07-Oct-99	Omni Southeastern	NH1		Waste Paraformaldehyde	2,000	Waste raw material from production process; Paraformaldehyde.	Fuels Blending	Danchem	N/A

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99210	07-Oct-99	Omni Southeaster n	NH1		Waste Raw Materials	920	Waste raw materials from production process; Actinol FA-1, Trylox, and Tween 81.	Fuels Blending	Danchem	N/A
99210	07-Oct-99	Omni Southeaster n	NH1		Lauryl Chloride	496	Waste raw materials from production process; Lauryl Chloride.	Fuels Blending	Danchem	N/A
99210	07-Oct-99	Omni Southeaster n	NH1		Waste raw materials	19	Waste raw materials from production process; AMP 221, Varonic T202.	Fuels Blending	Danchem	N/A
99210	07-Oct-99	Omni Southeaster n	NH1		Waste Oakite and Emsorb	820	Waste raw material from production process; Oakite and Emsorb 6900.	Fuels Blending	Danchem	N/A
99210	07-Oct-99	Omni Southeaster n	NH1		Waste V50	4	Waste raw materials from production process; V50.	Fuels Blending	Danchem	N/A
99209	08-Oct-99	Ecoflo	NH1		Waste V-pyrol	1,200	Waste raw material from spill clean-up; V-pyrol and water.	Fuels Blending	Danchem	PVP's
99206	01-Oct-99	Rineco	NH1		CPPO Wash Water	20,085	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99204	24-Sep-99	Rineco	NH1		CPPO Wash Water	12,585	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99202	23-Sep-99	Ecoflo	NH1		Waste Epon 828	400	Waste epoxy resin from production process; Epon 828.	Fuels Blending	Danchem	Epon 828
99200	17-Sep-99	Rineco	NH1		Waste water	7,880	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99198	10-Sep-99	Rineco	NH1		Waste Water	17,201	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99194	03-Sep-99	Rineco	NH1		Waste Water	18,067	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99191	26-Aug-99	Rineco	NH1		Wash Water	13,870	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99187	19-Aug-99	Rineco	NH1		Wash Water	8,518	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99187	19-Aug-99	Rineco	NH1		Waste Still Bottoms	9,375	Non-Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO
99184	17-Aug-99	Ecoflo	NH1		Waste Acrylonitrile	1,200	Waste Acrylonitrile and water from water strippings.	Fuels Blending	Rheox	Rheolate 450
99182	17-Aug-99	Omni Southeaster n	NH1		Waste Raw Material	40	Waste raw material from production process; Perkalink 301.	Fuels Blending	Rheox	Rheolate 5000
99179	10-Aug-99	Rineco	NH1		CPPO Wash Water	13,878	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99174	03-Aug-99	Rineco	NH1		CPPO Wash Water	13,765	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99170	21-Jul-99	Rineco	NH1		CPPO Wash Water	2,900	Non-Regulated Waste Water.	Fuels Blending	Omniglow	CPPO
99167	08-Jul-99	Rineco	NH1		Waste Still Bottoms	6,097	Non-Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO
99167	08-Jul-99	Rineco	NH1		Waste Wash Water	11,900	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99164	30-Jun-99	Rineco	NH1		Water Wash	10,144	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99159	18-Jun-99	Rineco	NH1		CPPO Wash Water	12,450	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99158	14-Jun-99	LWD	NH1		Waste AN169,Stab 06, ACP	5,308	Non-Regulated Solid Waste Material; floor sweepings, filter waste, etc. from the production of Gantrez AN169,Stabileze 06, and ACP 1135.	Fuels Blending	ISP	AN169,Stab, ACP
99156	16-Jun-99	Ecoflo	NH1		Waste Oil	450	Used oil (gear boxes, hydraulic, compressor, etc.)	Fuels Blending	Danchem	Maint.
99156	16-Jun-99	Ecoflo	NH1		Ethylene Glycol & Water	4,069	Waste Ethylene Glycol and water from spill clean-up in dike area.	Fuels Blending	Danchem	NA
99156	16-Jun-99	Ecoflo	NH1		V-pyrol & Absorbent	250	V-pyrol and absorbent from spill clean-up of T/T unloading pan.	Fuels Blending	Danchem	V-pyrol

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99156	16-Jun-99 Ecoflo		NH1		Waste EA-2751	972	Waste Acrylonitrile and water from EA-2751 process.	Fuels Blending	Rheox	EA-2751
99154	14-Jun-99 LWD		NH1		Waste AN169,Stab 06,ACP 1135	3,810	Non-Regulated Solid Waste Material; floor sweepings, filter waste, etc. from the production of Gantrez AN169,Stabileze 06, and ACP 1135.	Fuels Blending	ISP	AN169,Stab, ACP
99151	10-Jun-99 Rineco		NH1		CPPO Wash Water	12,068	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99151	10-Jun-99 Rineco		NH1		Waste Still Bottoms	6,093	Non-Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO
99149	03-Jun-99 Rineco		NH1		CPPO Wash & Water Split	7,969	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99146	03-Jun-99 Rineco		NH1		Waste FS-042	110	Non-Regulated Solid Waste Material; floor sweepings of dried FS-042.	Fuels Blending	Ciba Geigy	FS-042
99144	25-May-99 Rineco		NH1		Waste Still Bottoms	6,000	Non-Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO
99144	25-May-99 Rineco		NH1		CPPO Wash Water	8,633	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99143	13-May-99 Rineco		NH1		CPPO Wash Water	1,800	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO
99143	13-May-99 Rineco		NH1		Waste Still Bottoms	730	Non-Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO
99141	06-May-99 Rineco		NH1		CPPO Wash Water	8,464	Non-Regulated Waste Water.	Fuels Blending	Omniglow	CPPO & PTCSA
99140	04-May-99 Ecoflo		NH1		Waste Trilene	1,600	Non - Regulated Waste Water containing Trilene.	Fuels Blending	Danchem	Trilene
99140	04-May-99 Ecoflo		NH1		Used oil & Thermanol	2,550	Used Oil and Thermanol from gear boxes, compressors, etc.	Fuels Blending	Danchem	Oil,etc.
99136	22-Apr-99 Rineco		NH1		CPPO Wash Water	9,423	Non-Regulated waste water.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99135	08-Apr-99	LWD	NH1		Waste Oil	1,569	Non - Regulated Waste Oil.	Fuels Blending	ISP	AN 169 BF
99133	07-Apr-99	Rineco	NH1		CPPO Wash Water	2,200	Non-Regulated Waste Water.	Fuels Blending	Omniglow	CPPO
99133	07-Apr-99	Rineco	NH1		Waste Still Bottoms	8,566	Non-Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO
99132	31-Mar-99	Rineco	NH1		Waste FS-042	308	Non-Regulated Solid Waste Material; floor sweepings of dried FS-042.	Fuels Blending	Ciba Geigy	FS-042
99130	23-Mar-99	Rineco	NH1		CPPO Wash Water	19,501	Non - Regulated Waste Water	Fuels Blending	Omniglow	CPPO
99126	11-Mar-99	Rineco	NH1		Wash Water	4,385	Non - Regulated Waste Water	Fuels Blending	Omniglow	CPPO
99125	16-Mar-99	LWD	NH1		Waste Gantrez 169 & ACP 1135	5,188	Non-Regulated Solid Waste Material; floor sweepings, filter waste, etc. from the production of Gantrez AN169 and ACP 1135.	Fuels Blending	ISP	AN 169 BF & ACP
99124	09-Mar-99	Ecoflo	NH1		Waste Norcat M	622	Waste Norcat M solids from production process.	Fuels Blending	BFG	Norcat M
99124	09-Mar-99	Ecoflo	NH1		Waste Epon 828	74	Non-Regulated waste material; Epon 828 and Rheolate.	Fuels Blending	Danchem	Epon 828
99124	09-Mar-99	Ecoflo	NH1		Used Thermanol	1,012	Non-Regulated waste material; Thermanol and Absorbent.	Fuels Blending	Danchem	Thermanol
99124	09-Mar-99	Ecoflo	NH1		Capralactone	157	Non-Regulated waste material; Capralactone and water.	Fuels Blending	Danchem	Tone M-100
99120	25-Feb-99	Rineco	NH1		CPPO Wash Water	15,010	Non - Regulated Waste Water	Fuels Blending	Omniglow	CPPO
99113	12-Feb-99	Rineco	NH1		CPPO Wash Water	1,800	Non - Regulated Waste Water	Fuels Blending	Omniglow	CPPO
99107	21-Jan-99	Rineco	NH1		Waste Still Bottoms	6,804	Non - Regulated distilled bottoms from Isopar-H.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99107	21-Jan-99	Rineco	NH1		CPPO Wash Water	5,730	Non - Regulated Waste Water	Fuels Blending	Omni	CPPO
99103	07-Jan-99	Rineco	NH1		Water w/Sodium Bicarb	7,200	Non - Regulated Waste Water	Fuels Blending	Omni	CPPO
99102	05-Jan-99	Rineco	NH1		CPPO Wash Water	16,927	Non - Regulated Waste Water	Fuels Blending	Omni	CPPO
						427,400				
99238	28-Dec-99	LWD	NH1		Waste PVP Si10P	216	Non - Regulated off-spec finished goods; PVP Si10P.	Incineration	ISP	PVP Si-10P
99238	28-Dec-99	LWD	NH1		Waste PVP Si10	214	Non - Regulated off-spec finished goods; PVP Si10.	Incineration	ISP	PVP Si10
99232	09-Dec-99	LWD	NH1		Waste Styleze CC-10	23,096	Non-Regulated finished goods; Styleze CC-10.	Incineration	ISP	Styleze CC-10
99217	05-Nov-99	LWD	NH1		Waste Resin Beads	1,567	Waste Resin Beads from production process; Amberlyst 15 Resin, Water, Ethanol.	Incineration	ISP	Aquaflex
99211	12-Oct-99	LWD	NH1		Waste Resin Beads	1,285	Waste Resin Beads from production process; Amberlyst 15 Resin, Water, Ethanol.	Incineration	ISP	Aquaflex SF-40
99177	14-Jul-99	LWD	NH1		Waste Gantrez AN169BF	10,120	Non-Regulated Solid Waste Material; Gantrez AN169BF.	Incineration	ISP	AN 169 BF
99119	24-Feb-99	LWD	NH1		Compressor Oil/Water	872	Non-Regulated Solid Waste Material; Compressor oil and water.	Incineration	ISP	AN 169 BF
99119	24-Feb-99	LWD	NH1		Waste Styleze CC-10	24,857	Non-Regulated Solid Waste Material; off-spec finished goods.	Thermal Treatment	ISP	Styleze CC-10
						62,227				
99213	04-Nov-99	Omni Southeaster	NH1		Resin Beads	1,500	Waste resin beads from production process.	Land Fill	EI DuPont	Lime

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99213	04-Nov-99	Omni Southeastern	NH1		Waste Lime	1,500	Waste lime from production process.	Land Fill	EI DuPont	Lime
99184	17-Aug-99	Ecoflo	NH1		Waste Tone M-100	181	Spill clean-up; Tone M-100 and absorbent.	Land Fill	Danchem	Tone M
99184	17-Aug-99	Ecoflo	NH1		Waste Trilene	100	Spill clean-up; Trilene,dirt, and rocks.	Land Fill	Danchem	Trilene
99182	17-Aug-99	Omni Southeastern	NH1		Waste Lime	3,500	Waste lime from production process.	Land Fill	EI DuPont	Lime
99152	22-Jun-99	Omni Southeastern	NH1		Waste BGF	600	Waste BFG gel from production process.	Land Fill	BFG	Carbophil
99152	22-Jun-99	Omni Southeastern	NH1		Waste Lime	5,000	Waste lime from production process.	Land Fill	EI DuPont	Lime
99140	04-May-99	Ecoflo	NH1		Waste Rheolate 420	2,820	Off-spec commercial chemical product; Rheolate 420.	Land Fill	Rheox	Rheolate 420
99140	04-May-99	Ecoflo	NH1		Waste Rheolate 420	1,000	Non-Regulated Solid Waste Material	Land Fill	Danchem	Rheolate 420
99139	29-Apr-99	Omni Southeastern	NH1		Waste Lime	3,000	Waste lime from production process.	Land Fill	DuPont	Lime
99131	16-Mar-99	LWD	NH1		Waste Gantrez AN169 & ACP 1135	5,338	Non-Regulated Solid Waste Material; floor sweepings, filter waste, etc. from the production of Gantrez AN169 and ACP 1135.	Land Filled	ISP	169 BF,ACP-1135
2499	11-May-99	First Piedmont	NH1		Basin Sludge	17,500	Solids from basin and drain cleanouts.	Land Filled	Danchem	Basin Sludge
99235	28-Dec-99	LWD	NH1		Waste ACP-1135	2,948	Non-Regulated Solid Waste Material	Landfill	ISP	ACP-1135
99230	09-Dec-99	LWD	NH1		Waste Gantrez AN-169BF	2,588	Non-Regulated Solid Waste Material; floor sweepings.	Landfill	ISP	AN 169 BF
99228	29-Nov-99	Omni Southeastern	NH1		Resin Beads	2,000	Waste Resin Beads from production process.	Landfill	DuPont	Lime

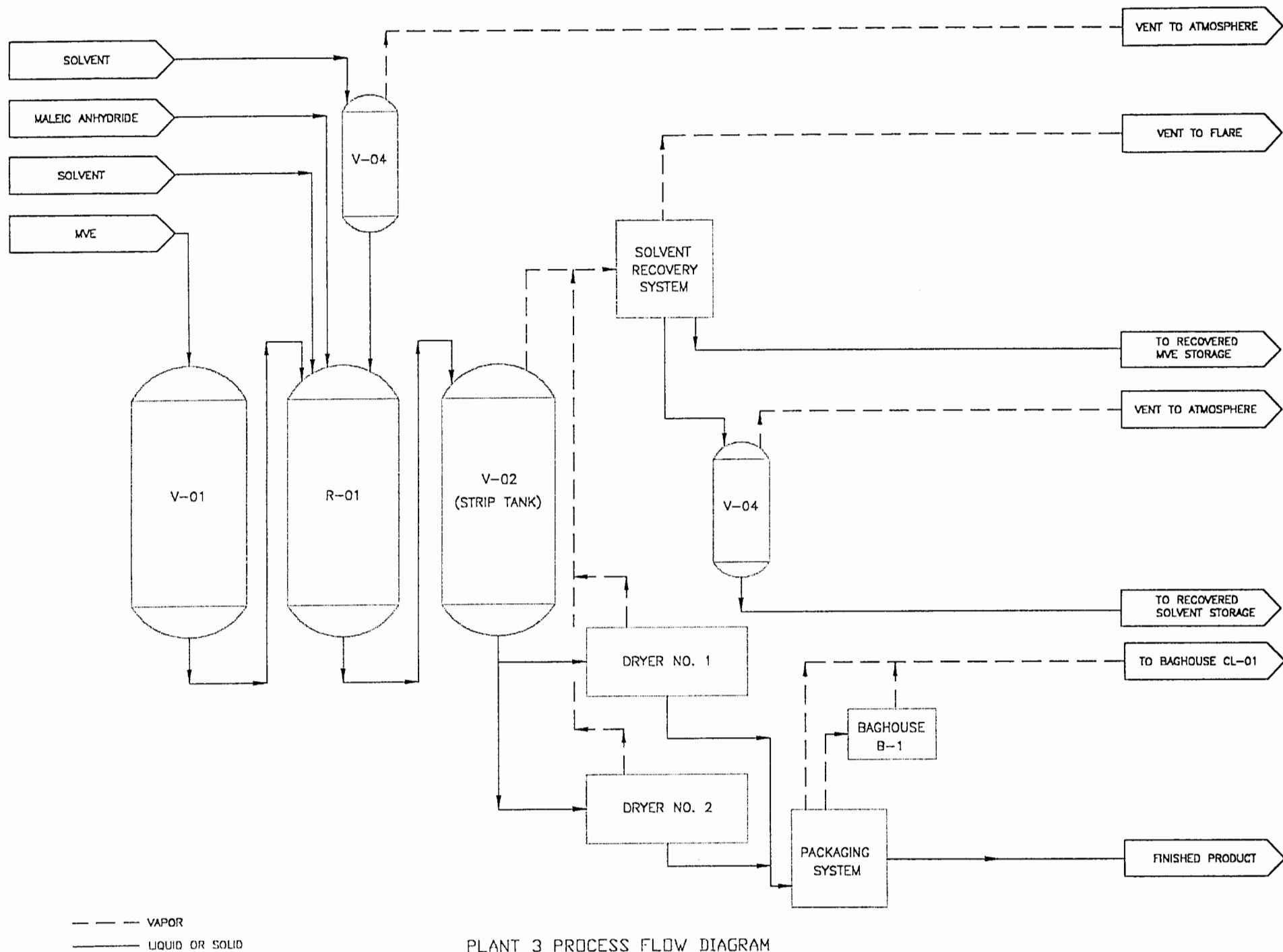
Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99228	29-Nov-99	Omni Southeaster n	NH1		Waste Lime	2,500	Waste lime from production process.	Landfill	DuPont	Lime
99227	23-Nov-99	Ecoflo	NH1		Waste HydroFluid & Absorbent	800	Waste hydraulic fluid and absorbent from spill clean-up.	landfill	Danchem	N/A
99225	19-Nov-99	LWD	NH1		Waste Gantrez AN169BF	3,381	Non-Regulated Solid Waste Material from finished goods and floor sweepings.	Landfill	ISP	AN 169 BF
99225	19-Nov-99	LWD	NH1		Waste ACP-1135	2,400	Non-Regulated Solid Waste Material	Landfill	ISP	ACP-1135
99224	17-Nov-99	LWD	NH1		Waste Gantrez AN169BF	9,430	Non-Regulated Solid Waste Material	Landfill	ISP	AN 169 BF
99220	05-Nov-99	LWD	NH1		Waste Gantrez AN169BF	3,105	Non-Regulated Solid Waste Material	Landfill	ISP	AN 169 BF
99210	07-Oct-99	Omni Southeaster n	NH1		Waste raw materials	721	Waste raw materials from production process; Span 60, HRJ 2210, THPA, & Dyhard P, Polyets, Airvol 205 & 540 and Mag. Oxide.	Landfill	Danchem	N/A
99202	23-Sep-99	Ecoflo	NH1		Waste clean-up	2,000	Waste absorbent containing oil, finished goods, and/or raw materials.	Landfill	Danchem	N/A
99140	04-May-99	Ecoflo	NH1		Absorbent Soil Cleanups	2,051	Absorbent from spill cleanups of chemical products, oil, etc.	Landfill	Danchem	Trilene,Oil,etc
99124	09-Mar-99	Ecoflo	NH1		Waste Rheolate	191	Waste solids from Rheolate I production.	Landfill	Danchem	Rheolate
99124	09-Mar-99	Ecoflo	NH1		Waste Norcat M	443	Non-Regulated Waste Material; Norcat M, buckets, and liners.	Landfill	BFG	Norcat M
99124	09-Mar-99	Ecoflo	NH1		Waste Epon 8121	169	Non-Regulated waste material; Epon 8121 and absorbent.	Landfill	Danchem	Epon 8121
99124	09-Mar-99	Ecoflo	NH1		Used Thermanol & Oil	706	Non-Regulated waste material; Thermanol, oil, and absorbent from spill clean up.	Landfill	Danchem	Thermanol & Oil
1840	22-Oct-99	First Piedmont	NH1		Waste Carbophil	8,742	Waste poly carbophil from production process.	Landfill	BFG	Carbophil

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
2500	27-Jul-99	First Piedmont	NH1		Drain Sludge	9,660	Solids from basin and drain cleanouts.	Landfilled	HDC	Basin Sludge
						95,874				
99202	23-Sep-99	Ecoflo	NH1		Waste Oil/Therminol	800	Used oil and/or therminol (gear boxes, hydraulic, compressor, etc.)	Recycle	Danchem	Oil
99213	04-Nov-99	Omni Southeaster n	NH1		Waste Trilene TE-141	1,400	Non-hazardous finished product that is not useable by the customer; Trilene TE-141.	Waste Water Treated	Uniroyal	Trilene
99208	07-Oct-99	Omni Southeaster n	NH1		Waste Trilene TE141	18,200	Non-hazardous finished product that is not useable by the customer; Trilene TE-141.	Waste Water Treated	Uniroyal	Trilene
99210	07-Oct-99	Omni Southeaster n	NH1		Waste Raw materials	437	Waste raw materials from production process; Ammonium Chloride and Cyanatex 695.	Wastewater Treated	Danchem	N/A

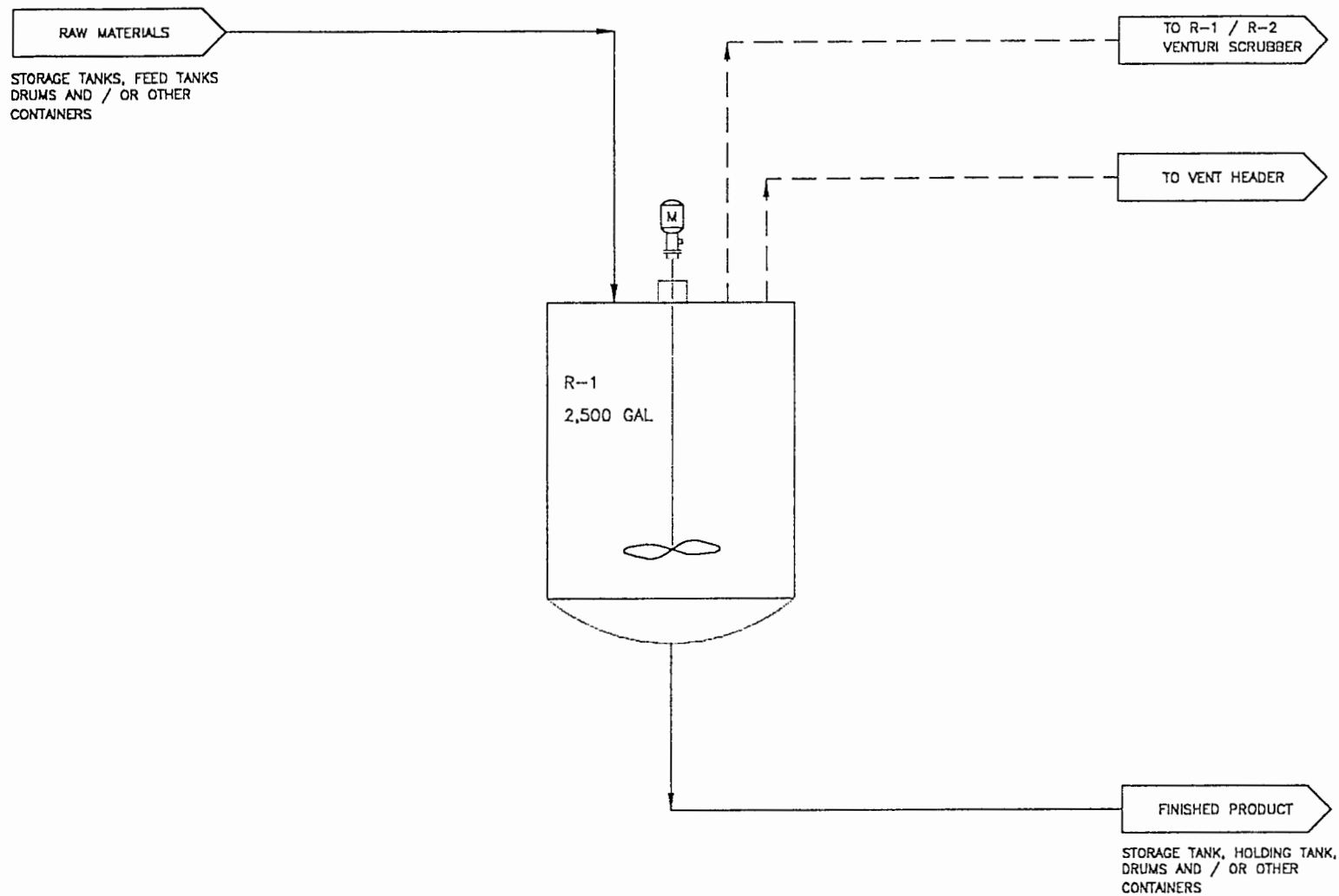
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Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99237	30-Dec-99	Rineco	D001		Mother Liquor Solids	305	Ignitable spent solvents from reactor cleaning operations containing isoparaffinic hydrocarbons and CPPO solids.	Fuels Blending	Omniglow	CPPO
99237	30-Dec-99	Rineco	D001		CPPO Wash Acetonitrile	1,360	Ignitable spent solvent from product washing; acetonitrile.	Fuels Blending	Omniglow	CPPO
99236	29-Dec-99	Rineco	D001		Mother Liquor	7,836	Ignitable spent solvents from reactor cleaning operations containing isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99236	29-Dec-99	Rineco	D001		CPPO Wash Acetonitrile	1,400	Ignitable spent solvent from product washing; acetonitrile.	Fuels Blending	Omniglow	CPPO
99235	28-Dec-99	LWD	D001		Waste Aquaflex FX-64	11,711	Waste off spec. ignitable liquid from production process; AquaFlex FX-64.	Fuels Blending	ISP	Aquaflex FX-64
99234	20-Dec-99	Ecoflo	D001	D035	Waste FC-9436	400	Waste FC-9436 from tank truck loading process. Contains FC-9436, buckets, filters, sample bottles, etc.	Fuels Blending	Danchem	FC-9436
99234	20-Dec-99	Ecoflo	D001		Waste Xylene & Acetone	13,600	Waste solvent from distillation; Xylene and small amounts of Acetone.	Fuels Blending	Danchem	PMA-50
99234	20-Dec-99	Ecoflo	D001		Waste Xylene & Acetone	7,600	Aqueous waste from production process; Water, Xylene, and small amounts of Acetone. Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Danchem	PMA-50
99229	08-Dec-99	Rineco	D001		CPPO Filter Cake	288		Fuels Blending	Omniglow	CPPO
99229	08-Dec-99	Rineco	D001		Mother Liquor	16,367	Ignitable spent solvents from reactor cleaning operations containing isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99229	08-Dec-99	Rineco	D001	D002	Crude CPPO Acid Wash	6,708	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99227	23-Nov-99	Ecoflo	D001	D035	Waste FC-9436	400	Waste FC-9436 from tank truck loading process. Contains FC-9436, buckets, filters, sample bottles, etc.	Fuels Blending	Danchem	FC-9436
99227	23-Nov-99	Ecoflo	D001		Waste Mineral Spirits	800	Waste solvent from clean-up; Mineral Spirits and Water.	Fuels Blending	Danchem	N/A
99226	23-Nov-99	Rineco	D001		Mother Liquor	8,116	Ignitable spent solvents from reactor cleaning operations containing isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO

Manifest Number	Date	Hazwaste Facility	Primary Waste Code	Secondary Waste Code	Waste Description	Quantity	DanChem Description	Treatment Method	Combo30	Combo32
99226	23-Nov-99	Rineco	D001	D002	Crude CPPO Acid Wash	1,903	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99223	19-Nov-99	LWD	D001		Waste Ethanol	8,291	Waste Ethanol and Water from production process.	Fuels Blending	ISP	Aquaflex
99222	17-Nov-99	LWD	D001		Waste IPA	1,156	Waste solvent from product strippings; Isopropynol.	Fuels Blending	ISP	PVP/VA 60/40
99221	16-Nov-99	Rineco	D001	D002	Crude CPPO Acid Wash	1,134	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99221	16-Nov-99	Rineco	D001		Waste Distilled Isopar-H	978	Ignitable spent solvent from water stripping; Isopar-H.	Fuels Blending	Omniglow	CPPO
99221	16-Nov-99	Rineco	D001		Recovered/Wash Acetonitrile	10,512	Ignitable spent solvent from product washing & recovery; Acetonitrile.	Fuels Blending	Omniglow	CPPO
99221	16-Nov-99	Rineco	D001		Mother Liquor	8,140	Ignitable spent solvents from reactor cleaning operations containing isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99218	09-Nov-99	Rineco	D001		Mother Liquor	2,040	Ignitable spent solvents from reactor cleaning operations containing isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99218	09-Nov-99	Rineco	D001		Recovered/Wash Acetonitrile	6,427	Ignitable spent solvent from product washing and recovery; acetonitrile.	Fuels Blending	Omniglow	CPPO
99218	09-Nov-99	Rineco	D001		Waste Isopar-H	2,373	Spent solvent from production process; Isopar-H.	Fuels Blending	Omniglow	CPPO
99218	09-Nov-99	Rineco	D001	D002	Crude CPPO Acid Wash	5,264	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO
99218	09-Nov-99	Rineco	D001		CPPO Filter Cake	584	Solids containing flammable liquid (acetonitrile, isoparaffinic hydrocarbons, etc.) from reactor cleaning and/or process operations.	Fuels Blending	Omniglow	CPPO
99217	05-Nov-99	LWD	D001		Waste Ethanol	15,267	Waste Ethanol and Water from production process.	Fuels Blending	ISP	Aquaflex
99215	29-Oct-99	Rineco	D001	D002	Crude CPPO Acid Wash	4,425	Water split from separation process; water containing ignitable isoparaffinic hydrocarbons.	Fuels Blending	Omniglow	CPPO



PLANT 3 PROCESS FLOW DIAGRAM

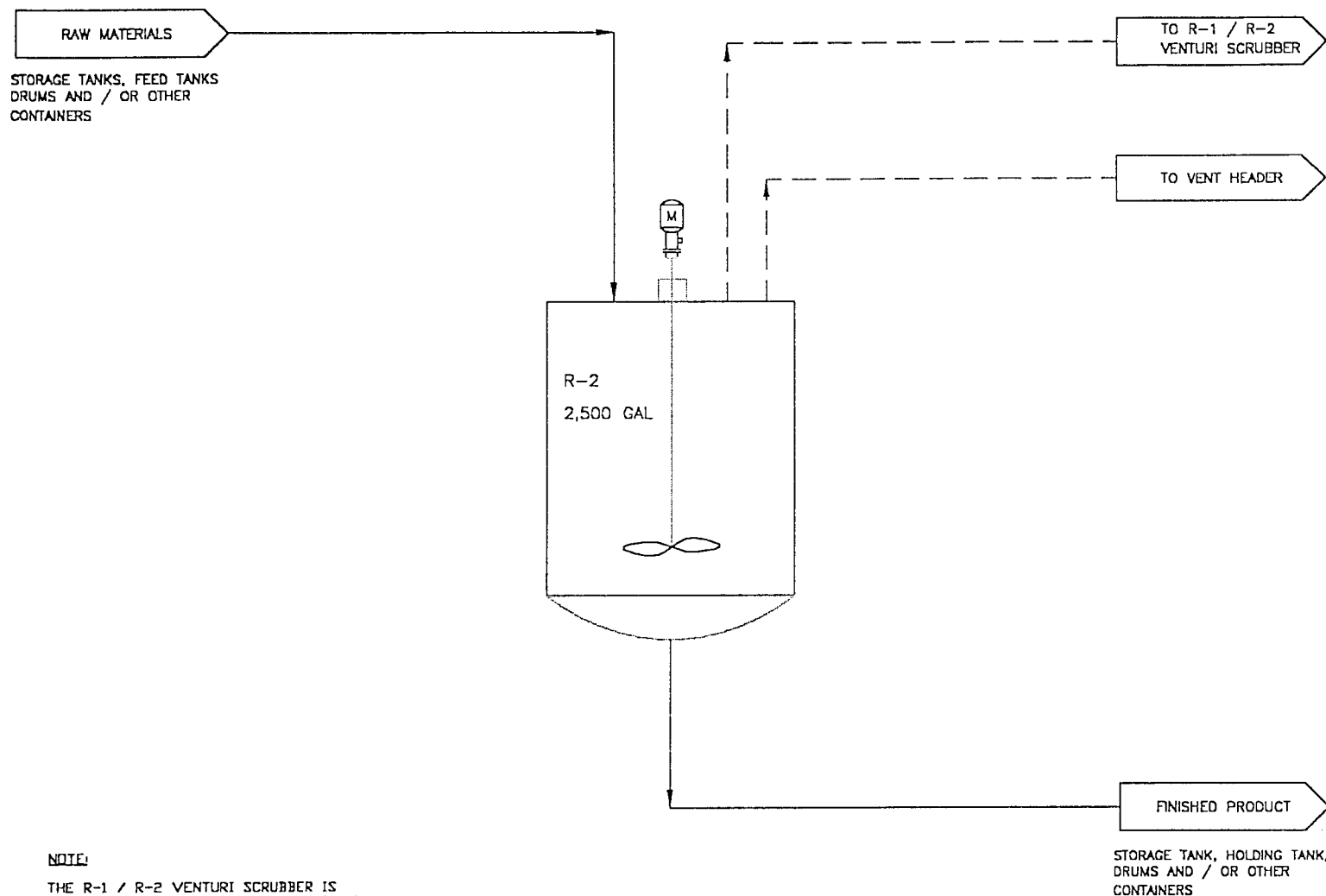


NOTE:

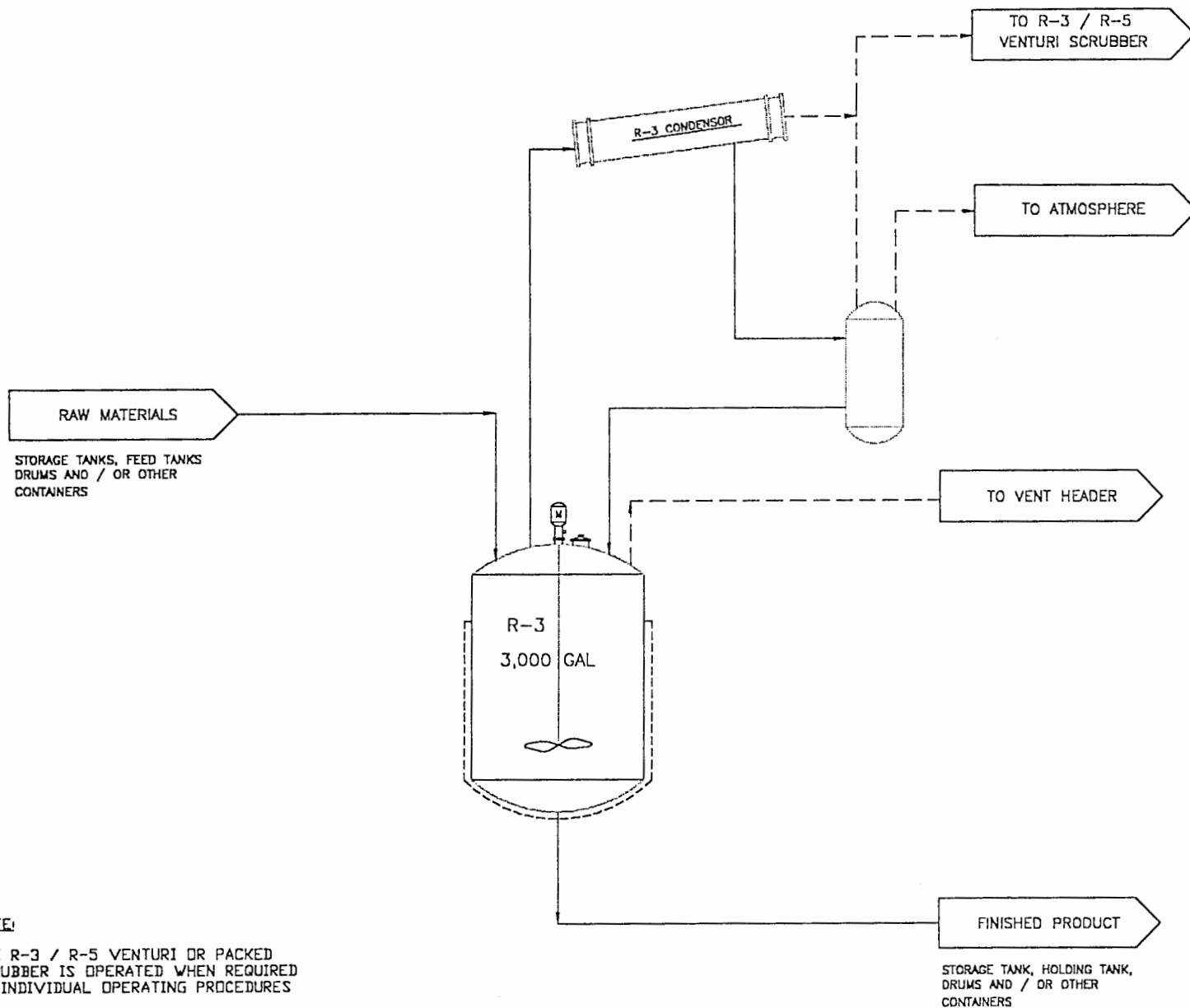
THE R-1 / R-2 VENTURI SCRUBBER IS
OPERATED WHEN REQUIRED BY INDIVIDUAL
OPERATING PROCEDURES

R-1 PROCESS FLOW DIAGRAM

--- VAPOR
——— LIQUID OR SOLID



R-2 PROCESS FLOW DIAGRAM



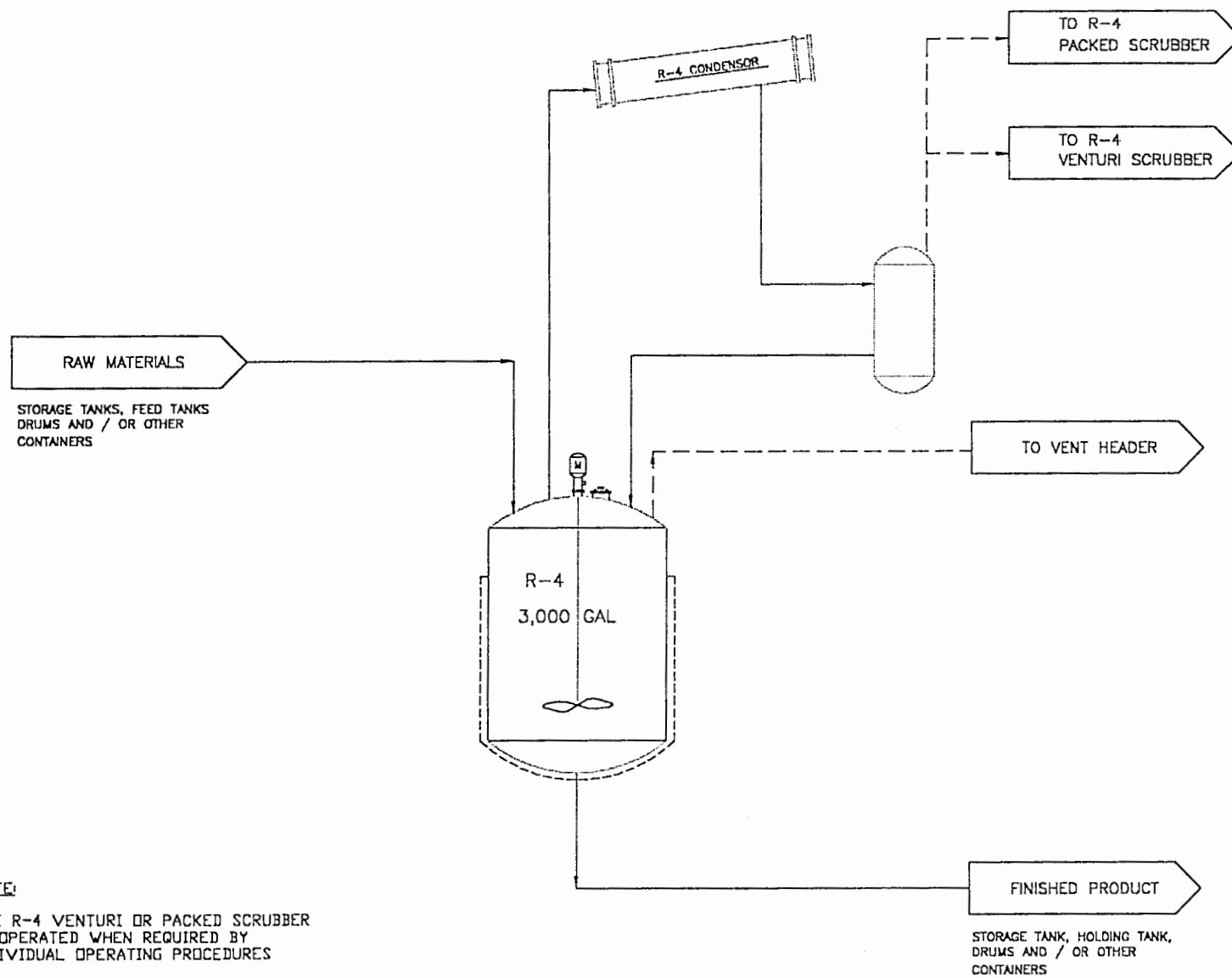
NOTE:

THE R-3 / R-5 VENTURI OR PACKED SCRUBBER IS OPERATED WHEN REQUIRED BY INDIVIDUAL OPERATING PROCEDURES

R-3 PROCESS FLOW DIAGRAM

1-19-98 CB\VV

----- VAPOR
 _____ LIQUID OR SOLID



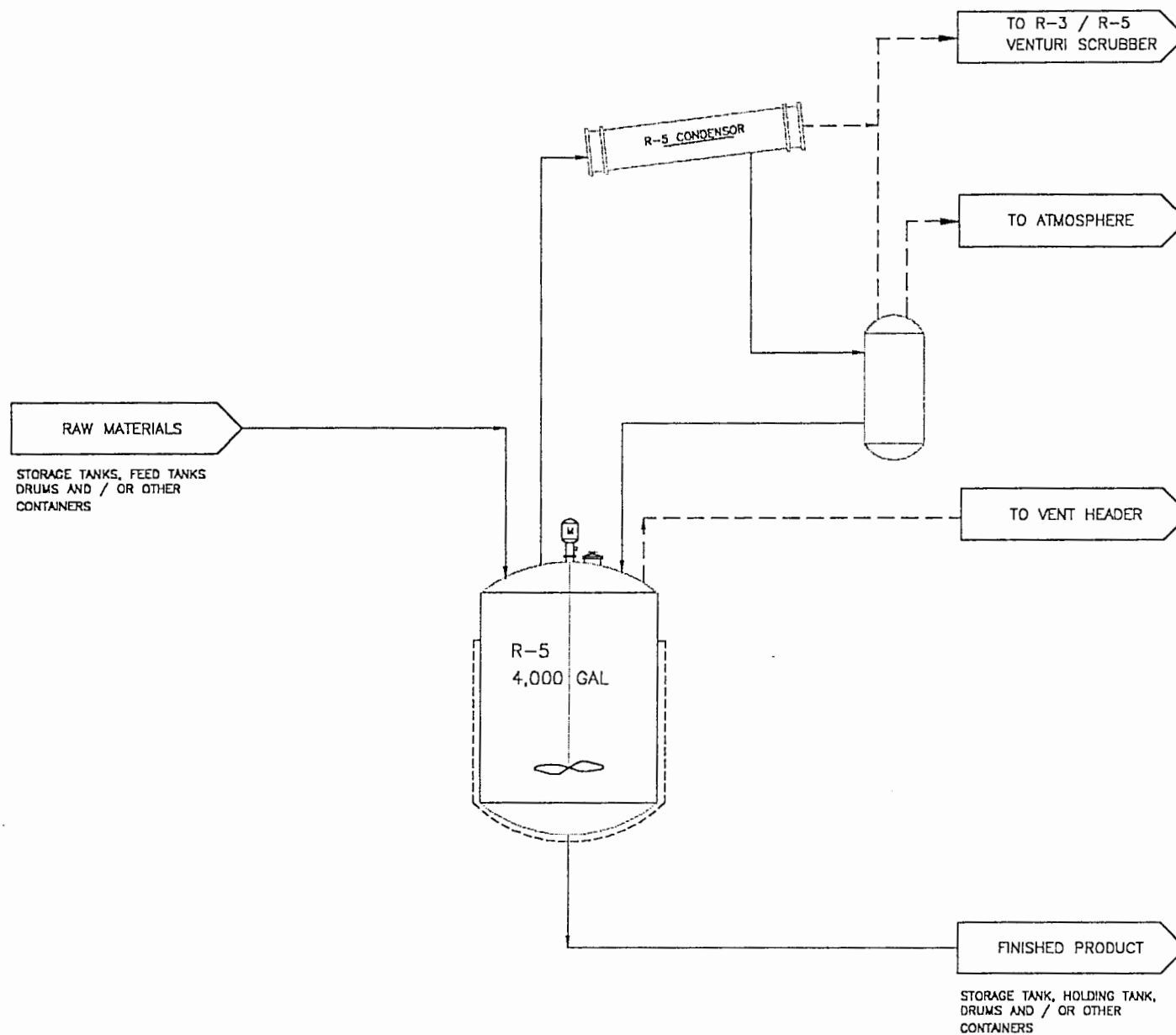
NOTE:

THE R-4 VENTURI OR PACKED SCRUBBER
IS OPERATED WHEN REQUIRED BY
INDIVIDUAL OPERATING PROCEDURES

R-4 PROCESS FLOW DIAGRAM

1-19-90 CB\VV

--- VAPOR
— LIQUID OR SOLID



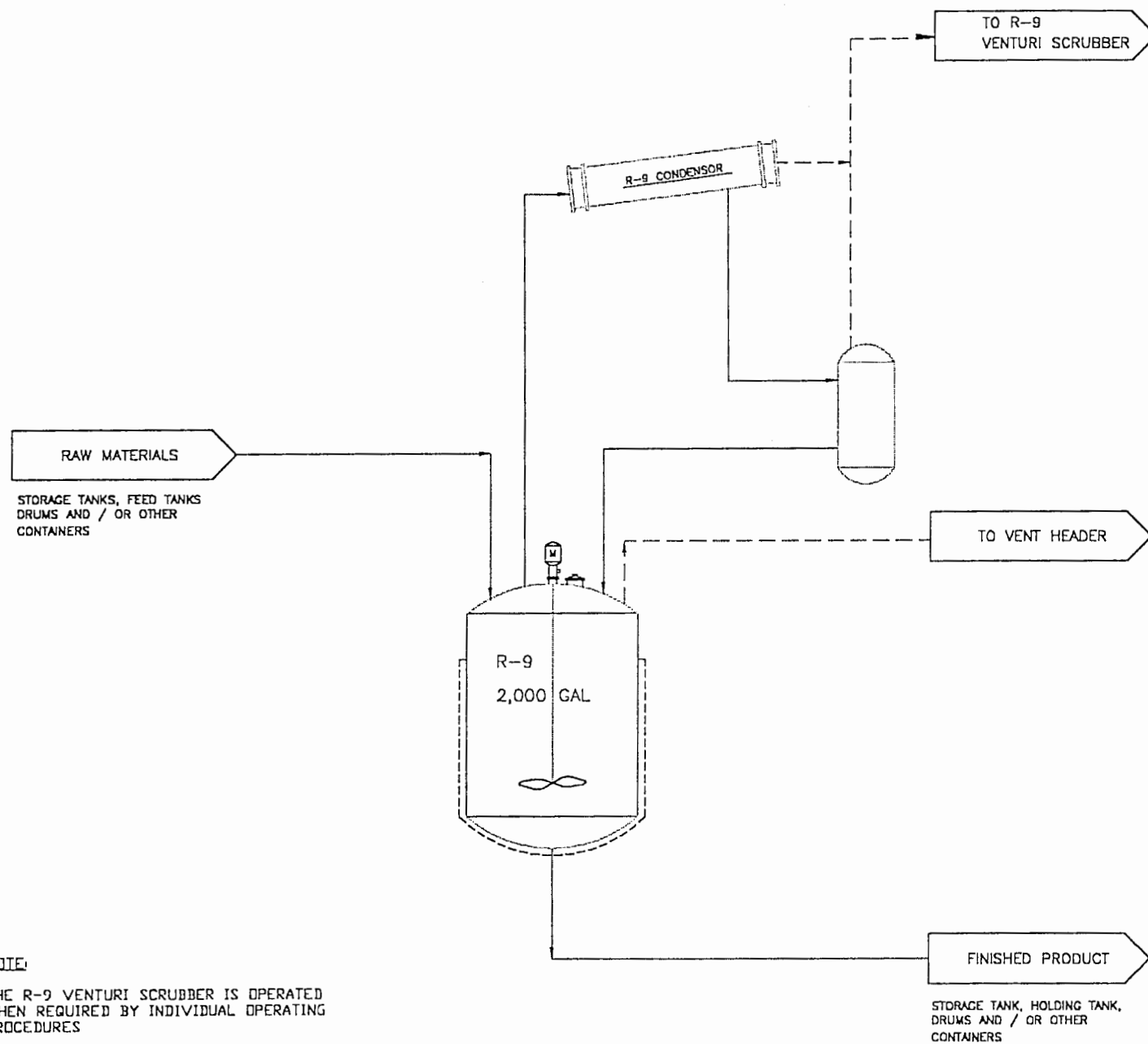
NOTE:

THE R-3 / R-5 VENTURI SCRUBBER IS OPERATED WHEN REQUIRED BY INDIVIDUAL OPERATING PROCEDURES

R-5 PROCESS FLOW DIAGRAM

1-19-98 CB\VV

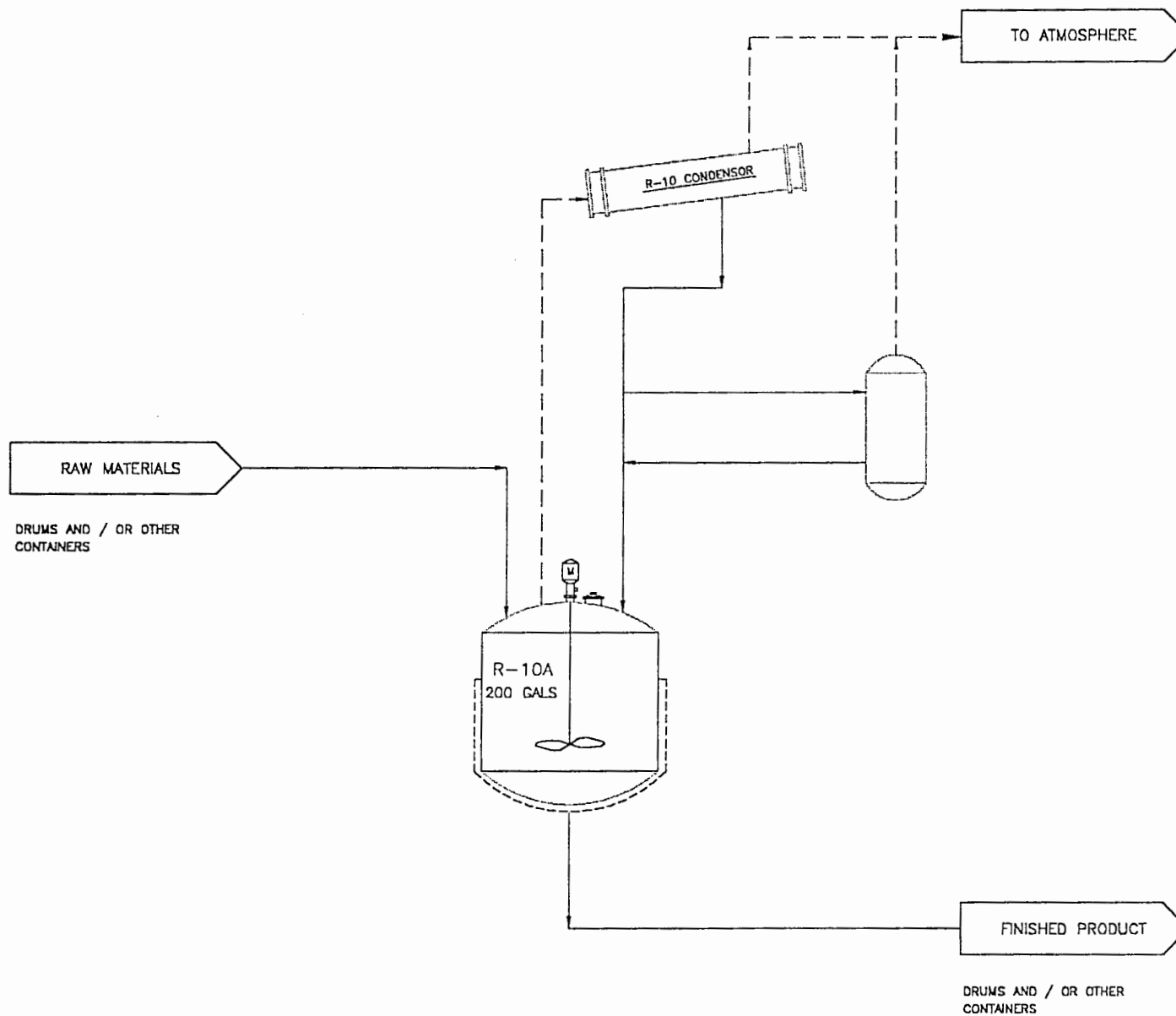
----- VAPOR
 _____ LIQUID OR SOLID

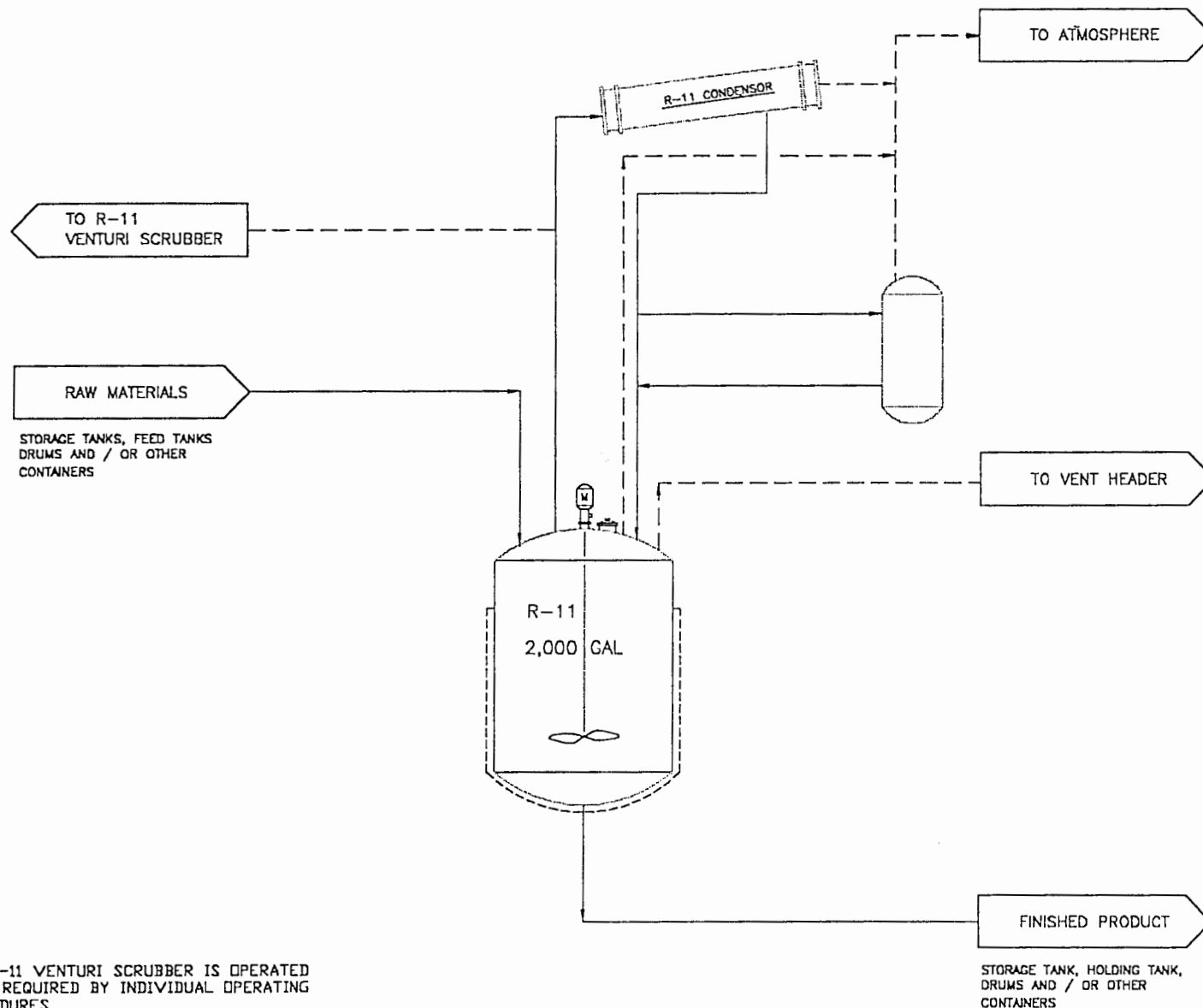


R-9 PROCESS FLOW DIAGRAM

1-19-98 CB/VVV

--- VAPOR
— LIQUID OR SOLID





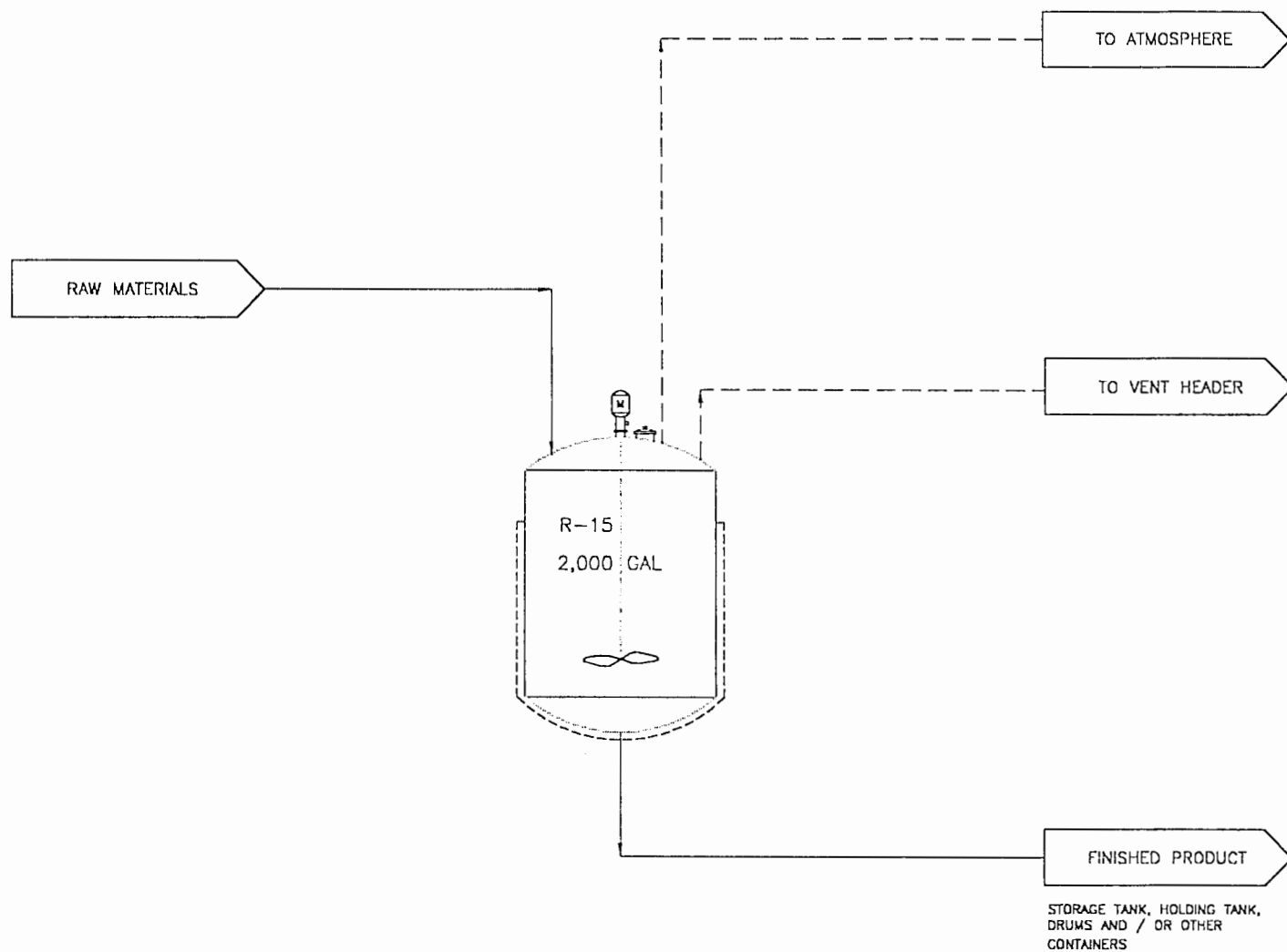
NOTE:

THE R-11 VENTURI SCRUBBER IS OPERATED
WHEN REQUIRED BY INDIVIDUAL OPERATING
PROCEDURES

R-11 PROCESS FLOW DIAGRAM

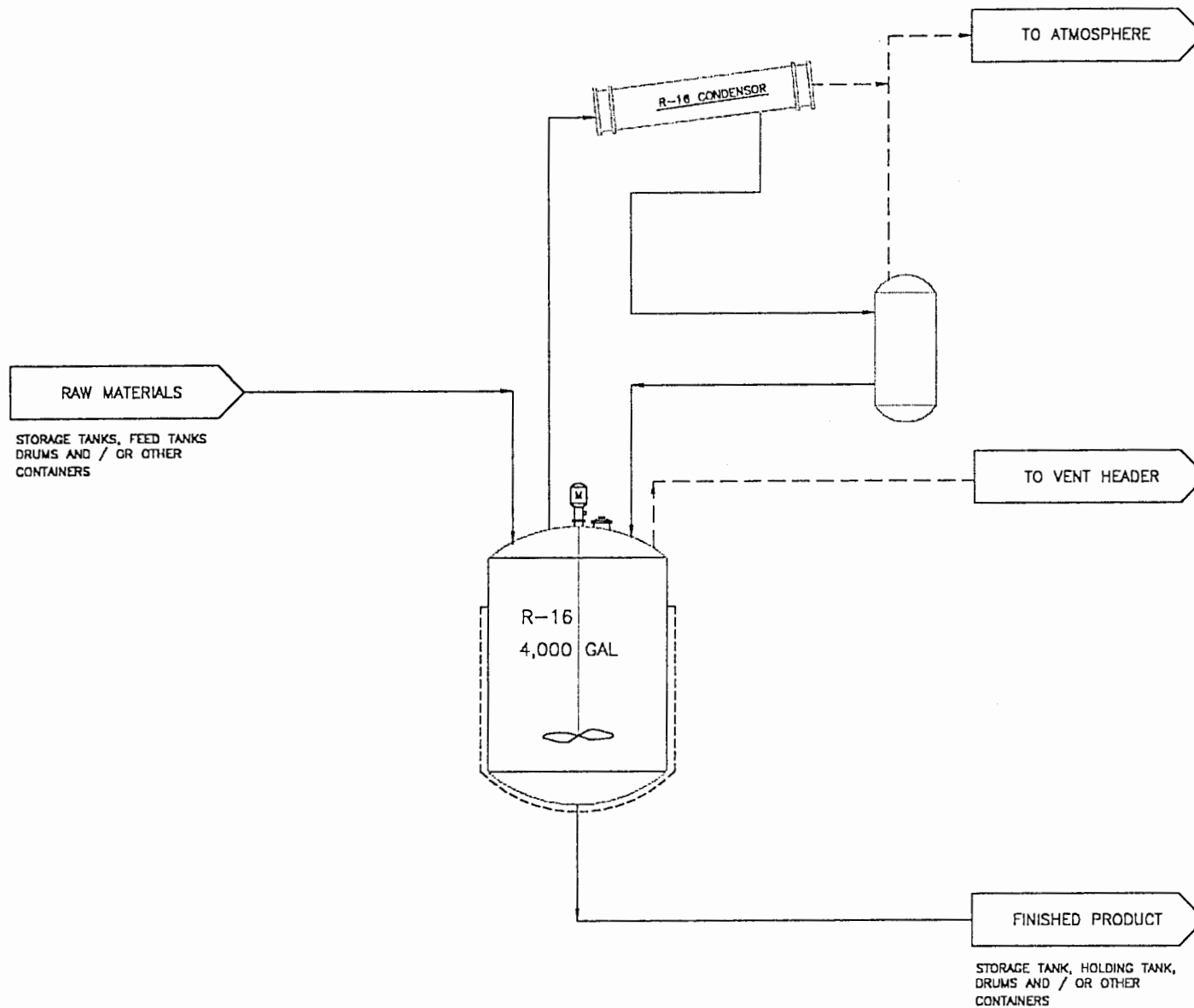
1-19-98 CB\VV

--- VAPOR
— LIQUID OR SOLID

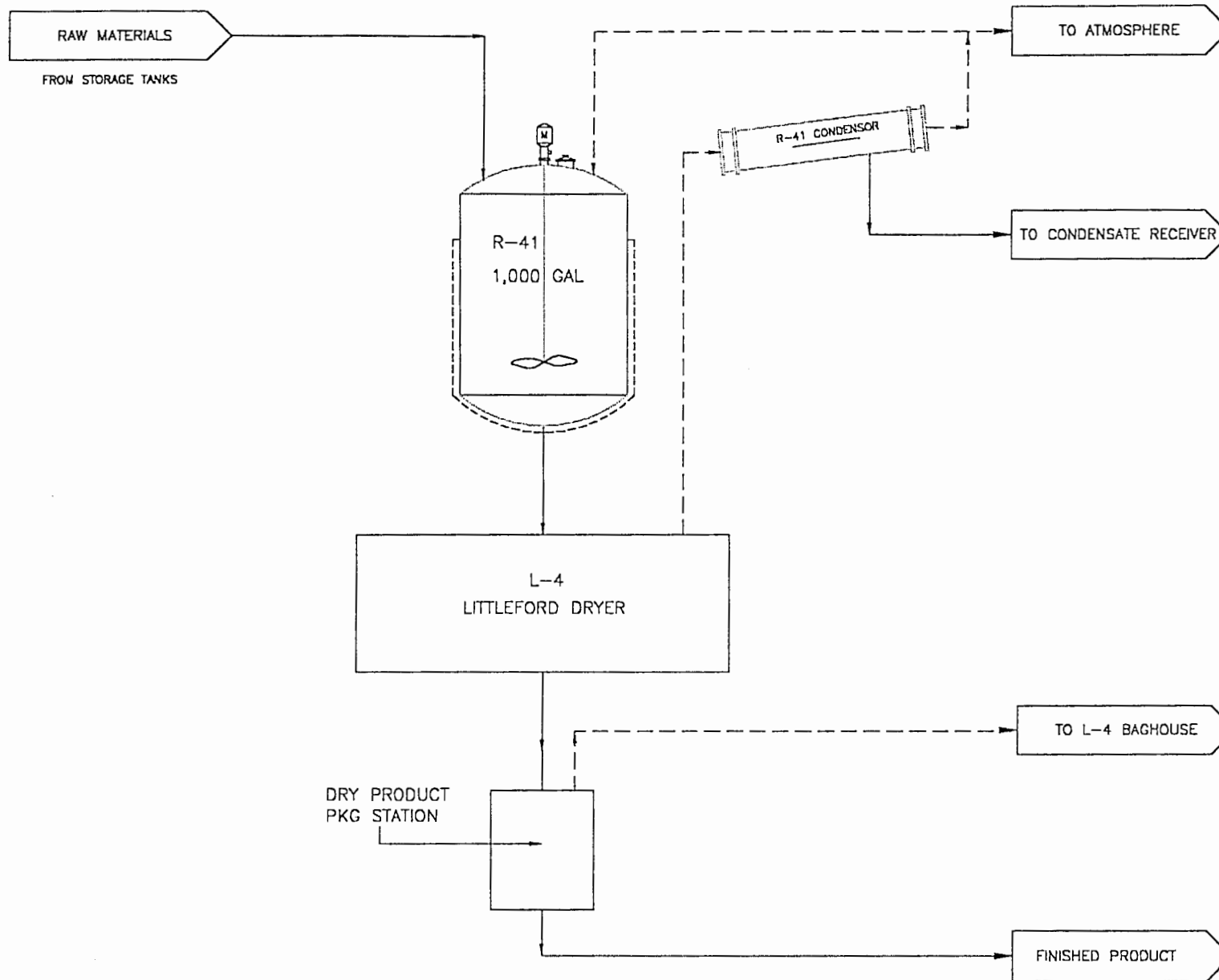


R-15 PROCESS FLOW DIAGRAM

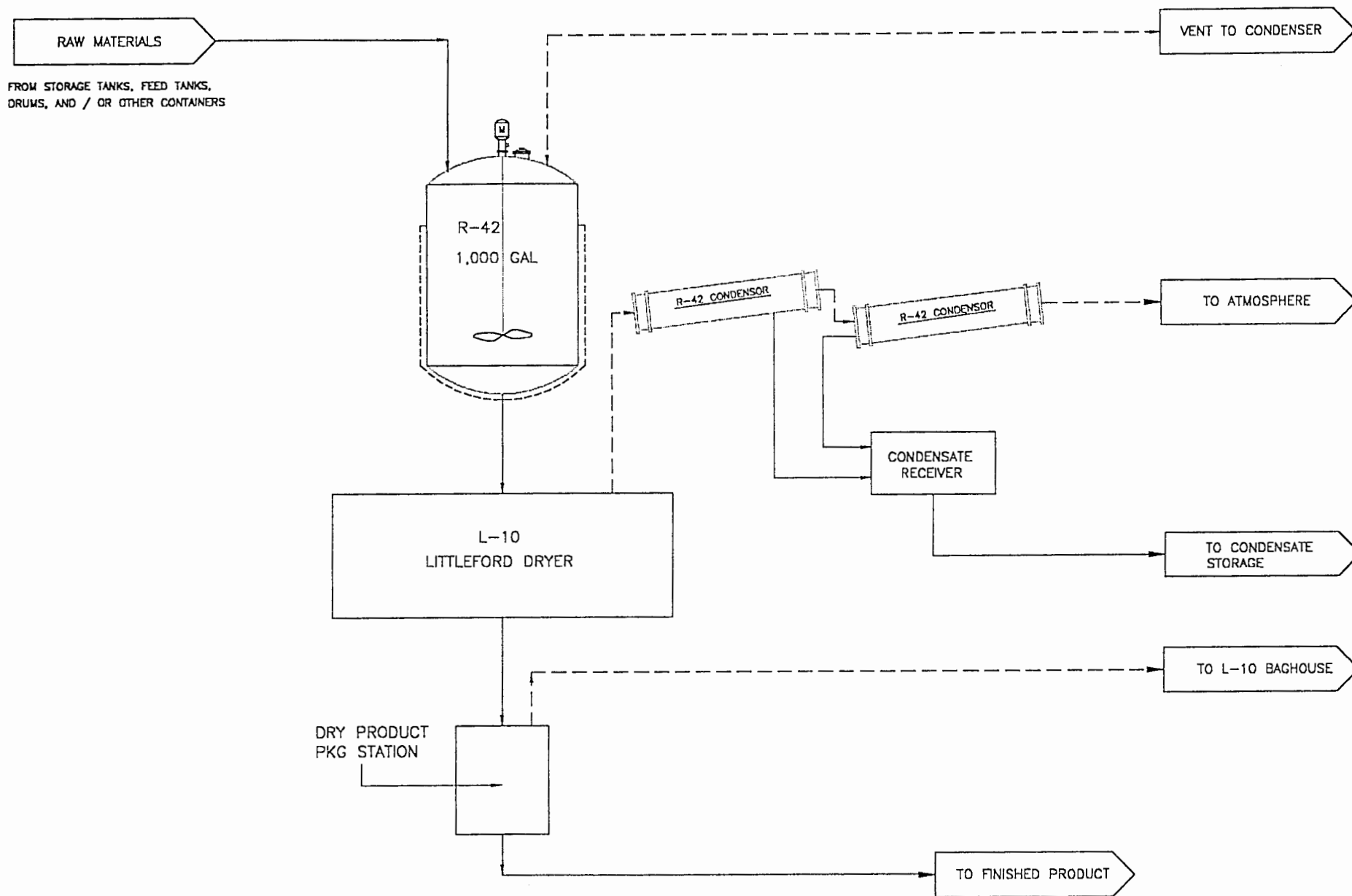
--- VAPOR
— LIQUID OR SOLID



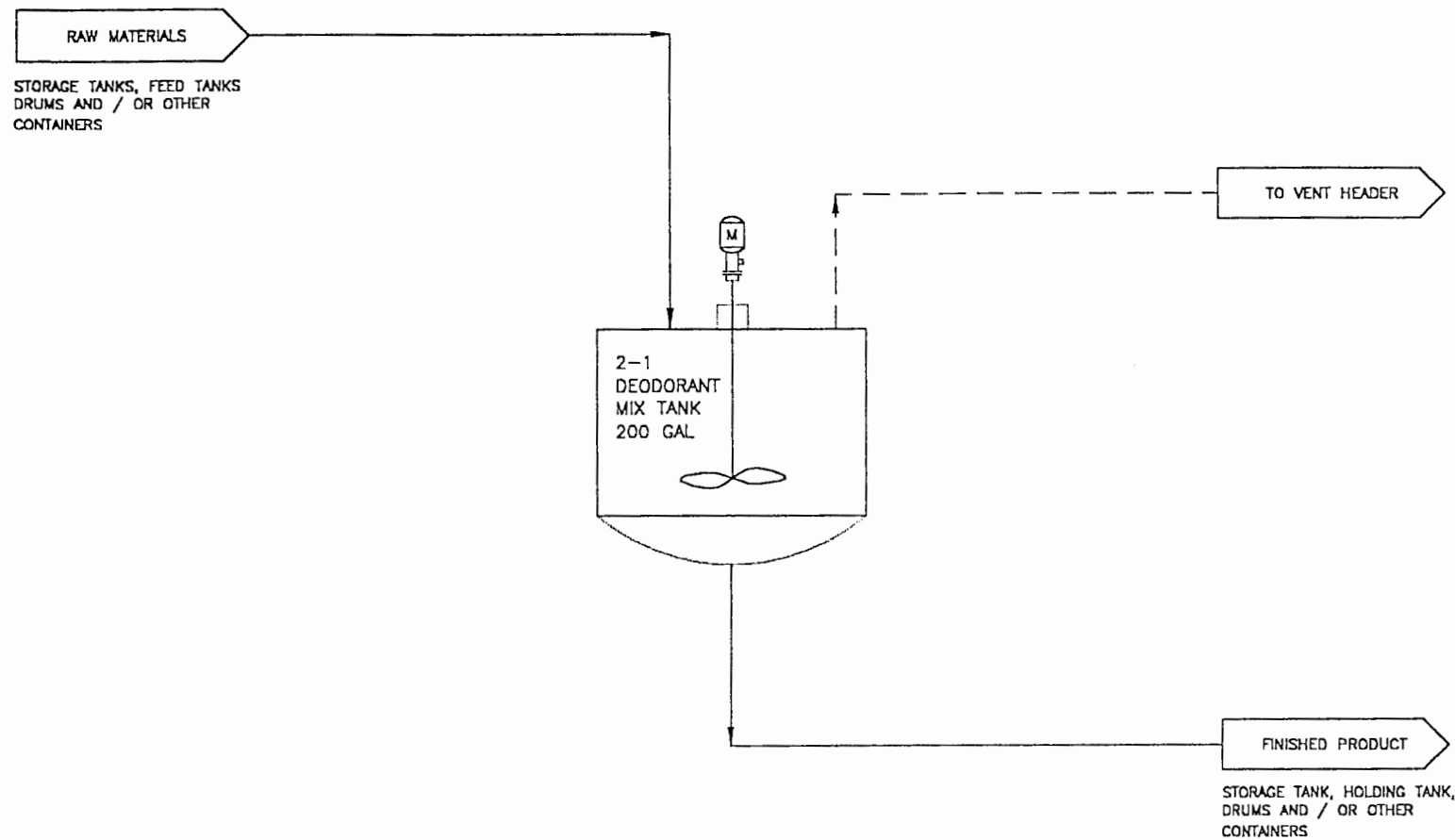
R-16 PROCESS FLOW DIAGRAM



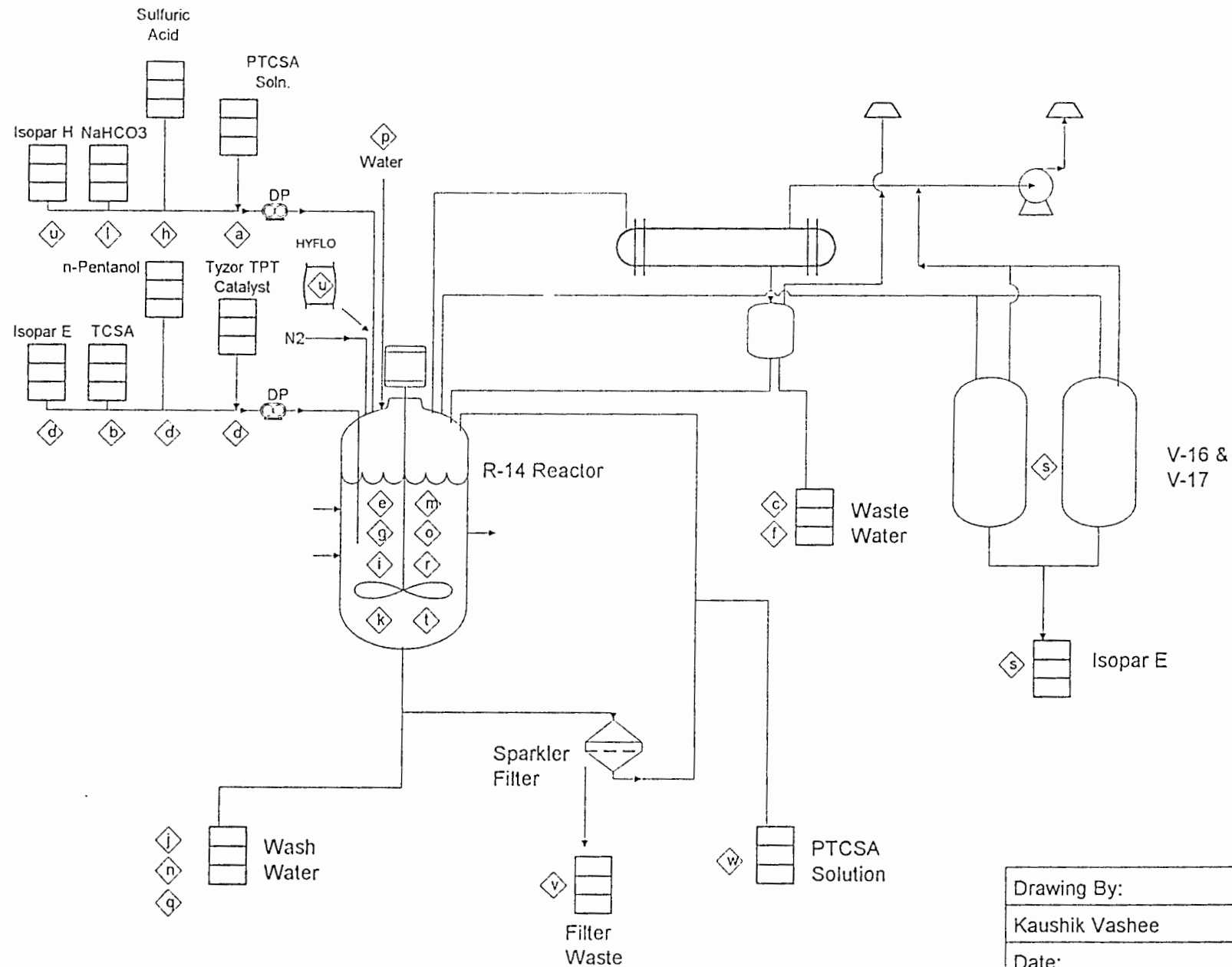
R-41 / L-4 LITTLEFORD DRYER
PROCESS FLOW DIAGRAM



R-42 / L-10 LITTLEFORD DRYER
PROCESS FLOW DIAGRAM

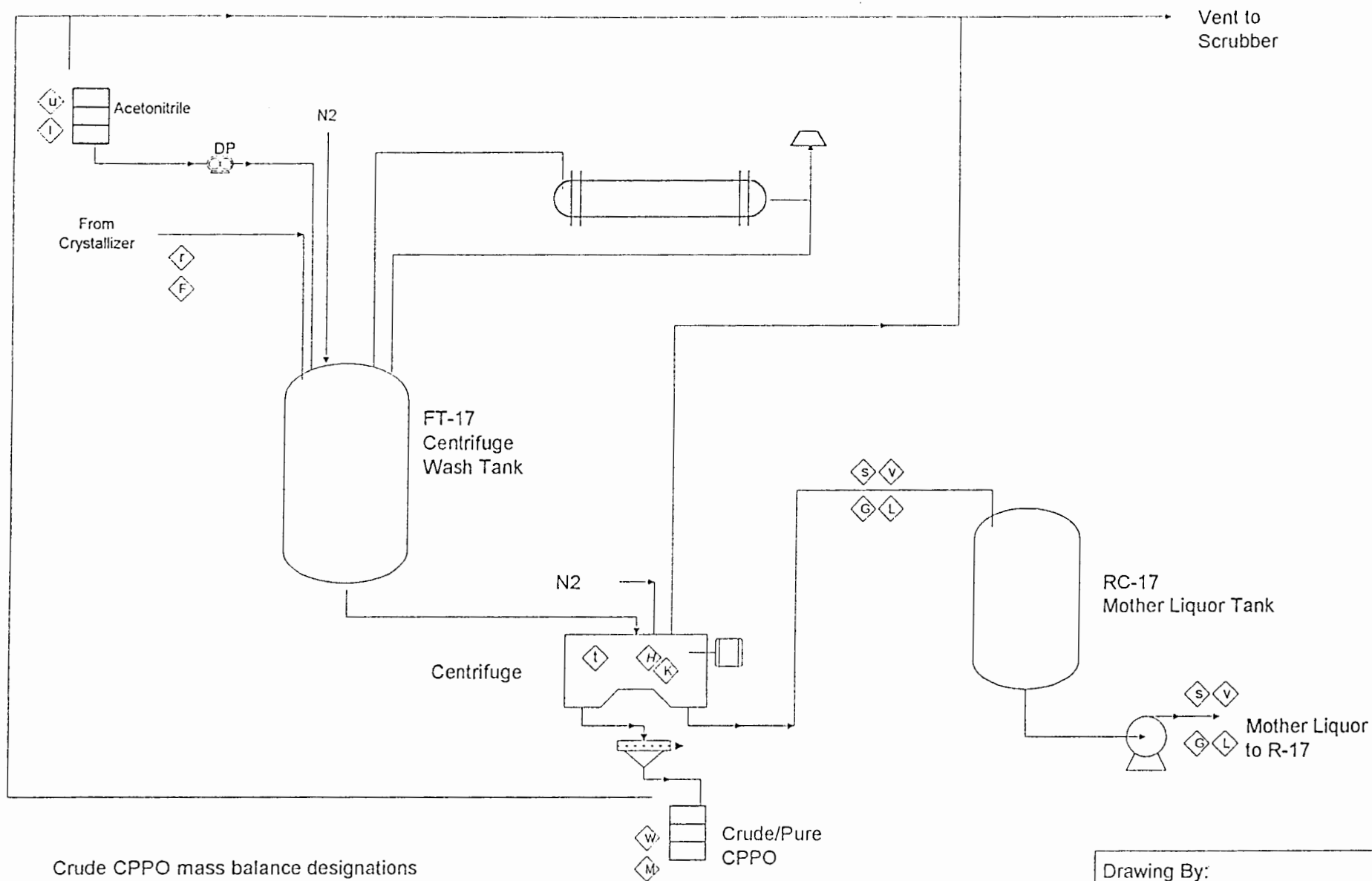


PROCESS FLOW DIAGRAM
2-1 DEODORANT MIX TANK



Omniglow - Esterification

Drawing By:
Kaushik Vashee
Date:
August 1, 1996
Revision: 0



Crude CPPO mass balance designations

PURE CPPO MASS BALANCE DESIGNATIONS

Omniglow - Crude/Pure CPPO Centrifuge

Drawing By:

Kaushik Vashee

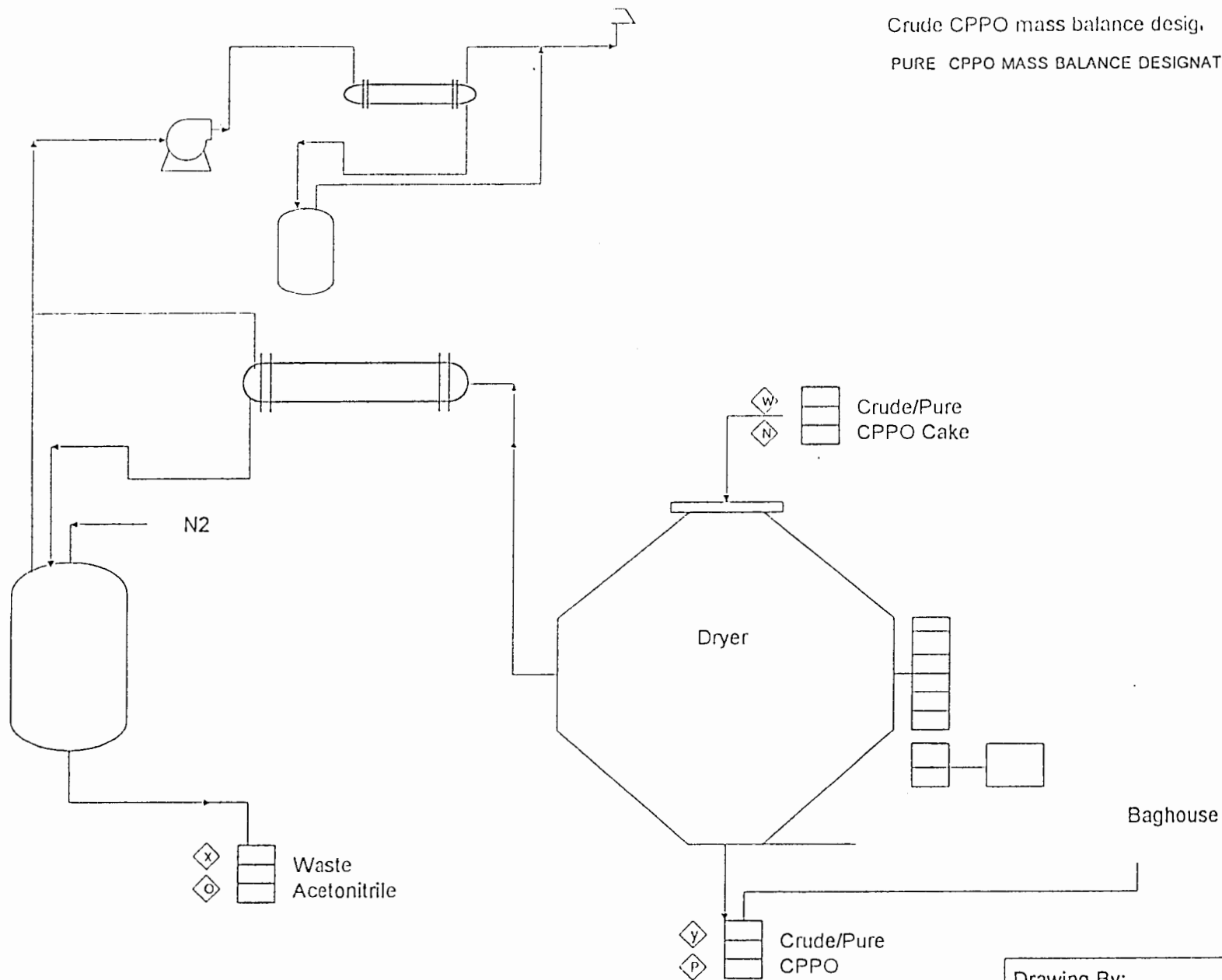
Date:

August 1, 1996

Revision: 0

Crude CPPO mass balance design, .ons

PURE CPPO MASS BALANCE DESIGNATIONS



Omniglow - Crude/Pure CPPO Drying

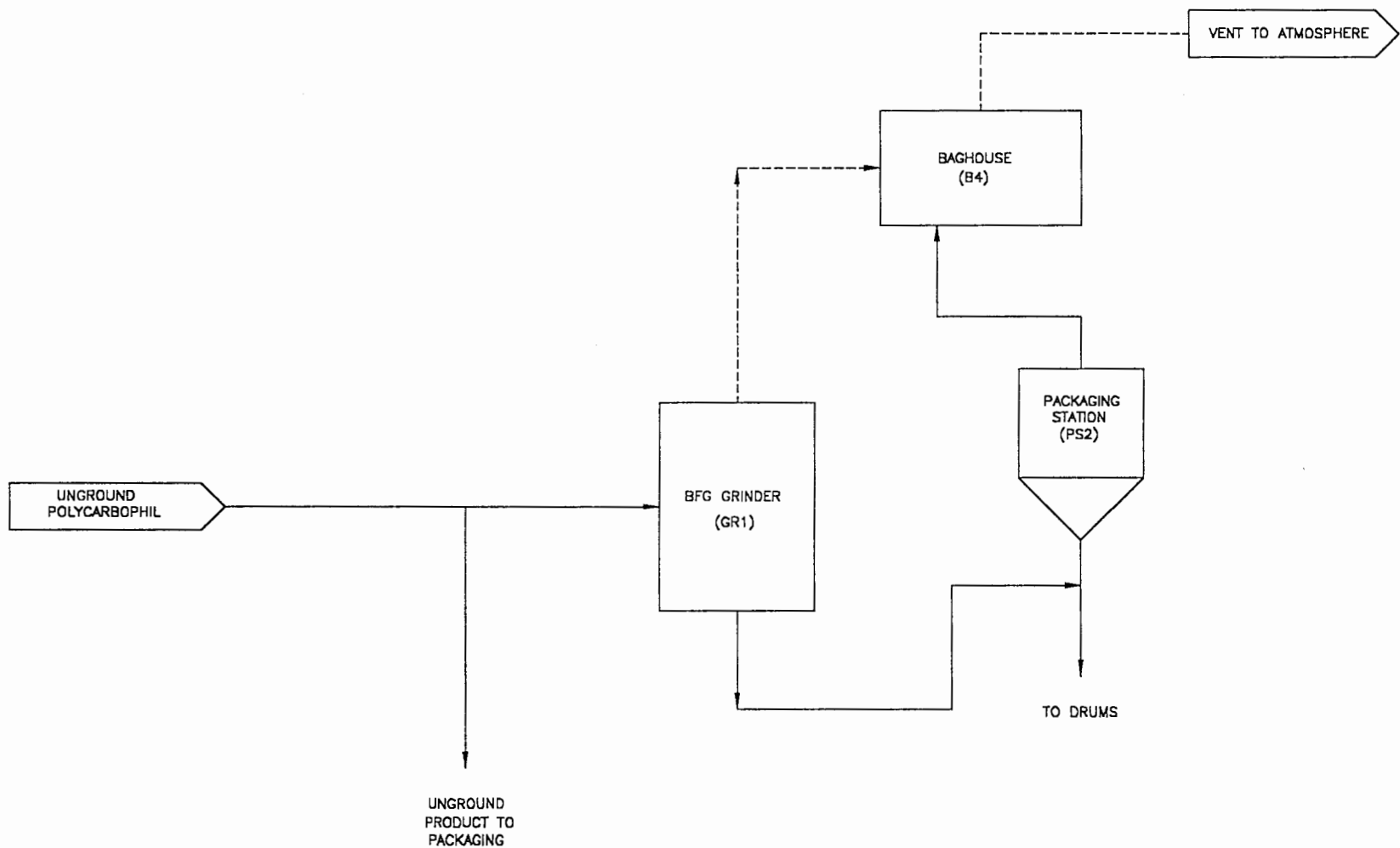
Drawing By:

Kaushik Vashee

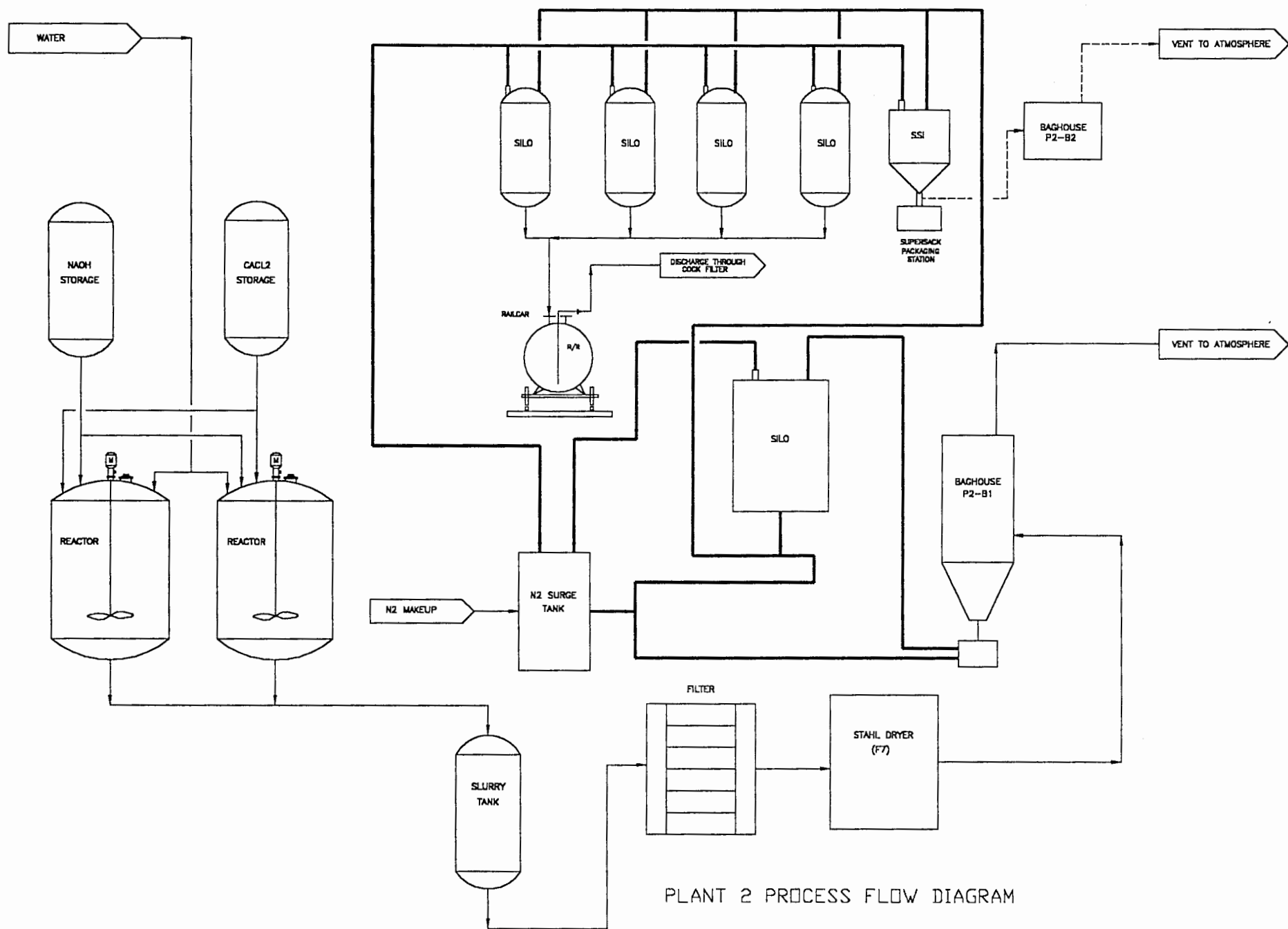
Date:

August 1, 1996

Revision: 1, 08/25/96



POLYCARBOPHIL PROCESS



PLANT 2 PROCESS FLOW DIAGRAM

- - - - - VAPOR
 ———— LIQUID OR SOLID
 ———— N₂ CLOSED-LOOP CIRCULATION

Transporter and TSDF Companies and EPA ID For Hickson DanChem

Transporter Names	EPA ID
1998	
Safety Kleen	ILD984908202
Maumee Express, Inc.	NJD986607380
Omni Transport	SCR000002964
Montgomery Tank Lines	KYD985071760
SouthCo	NCR000002501
1999	
NightHawk Special Commodities	MNR000022947
Metropolitan Environmental	INT190010397
LWD Trucking	KYD981477821
Tri State Motor Transit Co.	MOD095038998
TSDF NAMES	EPA ID
1998	
Rineco	ARD981057870
Southeastern Chemical & Solvent	SCD036275626
LWD Inc.	KYD088438817
Ecoflo, Inc.	NCD980842132
1999	
ISP Chemicals, Inc.	KYD006370175
ENSCO, Inc.	ARD069748192
EEl Treatment Facility	OHD083377010

FIGURE 7.2
SPILL/RELEASE RECORD & CHECKLIST
Hickson DanChem Corporation

1. Physical Location of Release/Spill: Plant 1/R-9 Weather: Clear/cool
2. Reported By: Ken Knick Phone No.: X135 Time: _____
3. Reported To: Scott Van Allen Date: 9/23/99
4. Date Release/Spill Occurred: 9/23/99 Time: 10:45 PM
5. What was spilled/released?: Styrene Quantity 1264 lbs. _____ gal.
 Oil? No Quantity _____ lbs. _____ gal.
 Hazardous Substance? Yes Quantity _____ lbs. _____ gal.
 Other? No
6. Potential Hazard of Released/Spilled Material: Styrene is a flammable liquid with a flash point of 88°F in its pure state.
7. Will/Did spill reach (SPILLS ONLY):
 Equalization Tank? No Basin? Yes Quantity _____ lbs. _____ gal.
 Storm Drain? No Quantity _____ lbs. _____ gal.
 Soil? No Quantity _____ lbs. _____ gal.
 Atmosphere? Yes (negligible quantities) Quantity _____ lbs. _____ gal.
 POTW? Yes Quantity _____ lbs. _____ gal.
 Other? No Quantity _____ lbs. _____ gal.
8. RQ Triggered ☒ YES NO NRC Notified? Yes Time: 11:45 PM
 NRC Contact Name: _____ NRC Incident No.: 449-958
9. Cause of spill/release: Sample valve on R-9 was left open during changing. Operator failed to notice spill had occurred until after material was released.
10. Has the spill/release been resolved or contained? YES ☒ NO
 Describe Measures: Approximately 1000 pounds of styrene was released to basin before basin valve was closed.
11. Is outside assistance required? YES ☒ NO
 Explain: Material was released to POTW.
12. Has operations/production been curtailed/halted/impaired? ☒ YES NO
 Describe: Basin was closed. Once it was determined that all but negligible quantities of styrene were released, the POTW was contacted, and wastewater flow was resumed.
13. Additional Comments: Also called Danville POTW and spoke with PEA - Compliance Monitoring Dept, Roanoke.

September 27, 1999



Ms. Clare Adams
American Anglian
Water Quality Control Facility
Riverview Industrial Park
229 Stinson Drive
Danville, VA 24540

DELIVERED BY HAND

Dear Ms. Adams:

On Thursday, September 23 at approximately 11:55 PM, I contacted the Danville Wastewater Plant to report an accidental discharge of styrene monomer. The discharge occurred when an employee left a sample valve open on a reactor during charging of styrene monomer. The styrene monomer flowed from the reactor, through the open sample valve, and into a nearby process wastewater drain.

When the employee realized a release had occurred, he did not report the release to the Plant 1 supervisor, as required by the Hickson DanChem Release Prevention Control and Contingency procedure (SPCCP). Instead, the release was discovered by the Plant 1 Supervisor at approximately 10:50 PM when the reactor contents were drummed during the final phase of the operating procedure. At that time, the effluent basin discharge valve was closed, and our SPCCP was implemented.

Based on our investigation of this incident, it is believed that the release of styrene monomer occurred at approximately 5:30 PM, when the reactor was being charged. Therefore, at the time the release was discovered by the Plant 1 Supervisor, approximately 1,000 pounds of styrene monomer had been discharged to the Danville Wastewater Plant.

Had the employee followed the spill notification procedures in our SPCCP and immediately reported the spill, the release of styrene monomer to the Danville Wastewater Plant would not have occurred. Instead, the styrene monomer would have been retained in our effluent basin, and could have been removed by skimming or pumping the material into drums. All Hickson DanChem employees receive training in spill prevention and control annually, including notification procedures. The most recent training was given July 21 and 23, 1999.

The effluent basin discharge valve was opened Friday, September 24, at approximately 3:07 AM after verifying that the styrene monomer remaining in the effluent basin was completely dissolved in the wastewater, and was of insufficient concentration to exhibit a



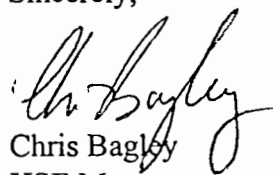
flash point. The Danville Wastewater Plant lead operator was contacted prior to opening the effluent basin discharge valve.

The employee responsible for causing the release has been discharged because they did not follow the spill notification procedures contained in our SPCCP. Hickson DanChem will review spill notification procedures in our next monthly safety training session, on October 20 and 22.

We are also determining the feasibility of installing a valve to isolate the Plant 1 bottom floor process wastewater drains in the event of a spill. The valve, if installed, will normally stay open, but would be closed in the event of a spill in Plant 1. Such a valve would not have prevented the styrene monomer release because spill notification procedures were not followed. However, the combination of refresher training and installation of this valve will reduce the risk of future spills in Plant 1 reaching the effluent basin and the Danville Wastewater Plant.

If you have any questions, please contact me at 797-8120 Ext. 199.

Sincerely,



Chris Bagley
HSE Manager

HICKSON DANCHEM TRAINING

CATEGORY: 1910.120(e)

TITLE: HAZARDOUS WASTE OPERATIONS and EMERGENCY RESPONSE

DESCRIPTION: All employees working on site (such as but not limited to equipment operators, general laborers and others) exposed to hazardous substances, health hazards, or safety hazards and their supervisors and management responsible for the site shall receive training meeting the requirements of this paragraph before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards, and they shall receive review training as specified in this paragraph.

FREQUENCY: Upon initial hiring; Annually thereafter
Site specific if new site

TRAINERS: Hickson DanChem Staff

TRAINEES: All employees exposed to hazardous substances, health or safety hazards, their supervisors, and managers responsible for the site.



HICKSON
DanChem

Revision No. 1

Date: October 1998

Reviewed by:

Charles B. [Signature]

Approved by:

Luther Smith

EMPLOYEE TRAINING RECORD

Training Conducted:

Hazardous Waste Operations/Emergency Response

Date:

7/28-30/99

Trainer(s):

Scott Van Allen

Length of Training:

30 minutes

Printed Name	Task No.	Department	Signature
<i>John E. [Signature]</i>	65	300	<i>John E. [Signature]</i>
<i>Walter B. Lee</i>		300	<i>Walter B. Lee</i>
Carol Boothe		LAB	<i>Carol Boothe</i>
Jean Haymore		LAB	<i>Jean Haymore</i>
Bernard Williams		100	<i>Bernard Williams</i>
John Skarbek		100	<i>John Skarbek</i>
Ronald Brooks		300	<i>Ronald Brooks</i>
Jerry A. Farmer		100	<i>Jerry A. Farmer</i>
ANDRE BENNETT		100	<i>Andre Bennett</i>
Bruce Motley		100	<i>Bruce Motley</i>
LAWRENCE GILBERT		100	<i>Lawrence Gilbert</i>

HAZWOPER 29 CFR 1910.120

Hickson DanChem Corporation
1998 Training Presentation

What is HAZWOPER?

- Hazardous Waste Operations and Emergency Response



HAZWOPER 29 CFR 1910.120

- Scope
- Application
- Paragraph (q)(11)(ii)

Scope (1910.120)(a)(1)

- (a)(1)(v) Emergency response operations for releases of, or substantial threats of releases of, hazardous substances without regard to the location of the hazard.

Application (1910.120)(a)(2)

- (2)(iv) Emergency response operations for releases of, or substantial threats of releases of, hazardous substances which are not covered by paragraphs (a)(1)(i) through (a)(1)(iv) of this section paragraph (q) of this section.

Emergency Response (1910.120)(q)(11)

- (q)(11)(ii) Where the clean up is done on plant property using plant or workplace employees, such employees shall have completed the training requirements of the following:
 - 1910.38(a): Emergency Response
 - 1910.134: Respiratory Protection
 - 1910.1200: Hazard Communication

Employee Emergency Response Plan (1910.38)

- (a)(1) The emergency response plan shall be in writing and shall cover designated actions employers and employees must take to ensure employee safety from fire and other emergencies.

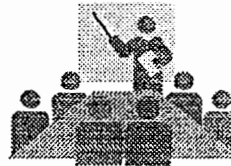
Hickson Danchem Emergency Response Plan



Purpose of the Plan

- To ensure HDC facility preparedness for effective response to and mitigation of accidental release from highly hazardous processes. Planned responses limit the severity of such releases and their impact on employee safety, public health and the environment.

Plant Emergency Organization



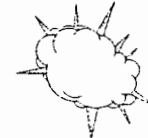
- Designated Person In Charge
- Functions of each individual and group
- Telephone Numbers (Office and Home)

Plant Risk Evaluation

- Quantity of Hazardous Materials
- Location of Hazardous Materials
- Properties
- Personal Protective Equipment
- Emergency Equipment

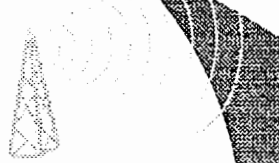
Emergency Response Procedures

- Notification
- Guard House
- General Evacuation Plan - Plants 1-2-3-4
- General Evacuation Plan - Research
- Medical
- Response to Toxic Gas Release
- Utilities Shut Down
- Bomb Threats
- Evacuation Routes



Communication Systems & Equipment

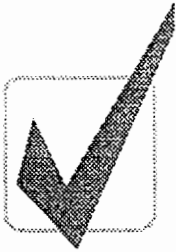
- Alarm Systems
- Names and Telephone Numbers
- Designated Person for Media Contact
- Procedure for Notifying Family or Injured
- Command Post



Emergency Equipment and Facilities

- Fire Fighting Equipment
- Safety Equipment
- Wind Detectors / Speed Indicators
- Emergency Medical Supplies
- First Aid / CPR Certified Personnel

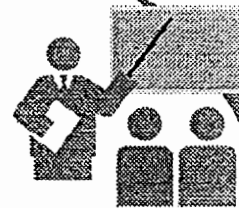
Procedure for Returning to Normal Operations



- Decontamination
- Equipment Checklist
- Monitor Contaminant Levels

Training & Drills

- Training
- Drills



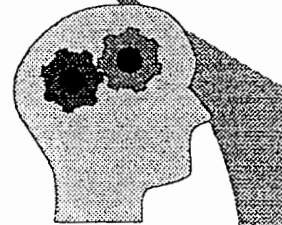
Inspections & Audits

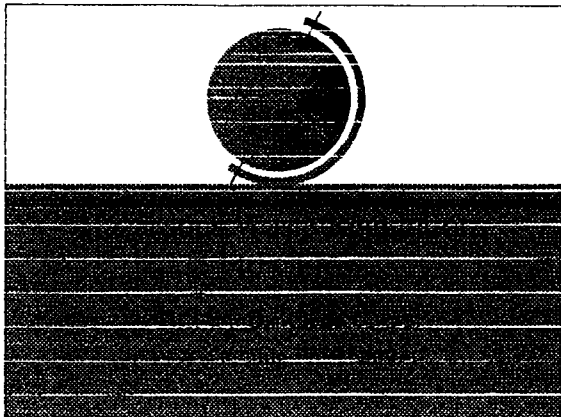


- Inspections
- Emergency Response Plan Audit

HAZWOPER (1910.120)

- Closing Comments
- Employee Questions or Concerns





Hazardous Waste ... Another name for DANGER

- ♦ The Federal Government made everyone who handles hazardous waste including all of us responsible. The laws that govern cover areas that protect us, Hickson DanChem, and everyone around us from potential accidents.



Resource Conservation and Recovery Act (RCRA)

The most important law regulating hazardous waste.

- ♦ RCRA is designed to reduce the hazards of hazardous waste by tracking and regulating from creation to disposal or "cradle" to "grave"



RCRA (Resource Conservation and Recovery Act)

- ♦ Tells what hazardous wastes are and how to keep track of them.
- ♦ Sets up rules for handling hazardous wastes.
- ♦ Provides a documentation system to track them.



Hazardous Waste is defined as:

- ♦ Ignitable
- ♦ Corrosive
- ♦ Reactive
- ♦ Toxic



RCRA Training Requirement

- ♦ Hickson DanChem Waste Handling & Storage Procedures
- ♦ Safety Training
- ♦ Chemical Hazard Recognition
- ♦ Personal Protective Equipment Use
- ♦ Respiratory Protection
- ♦ HHC Emergency Response Plan



Waste Handling Requirements

- ♦ HDC must have an EPA Permit (90 day)
- ♦ Identify & Analyze new waste streams
- ♦ Secure storage area
- ♦ Storage area routine inspections
- ♦ Spill Pollution Prevention Plan
- ♦ Emergency Response Plan
- ♦ Provide Protective Clothing
- ♦ Maintain Records



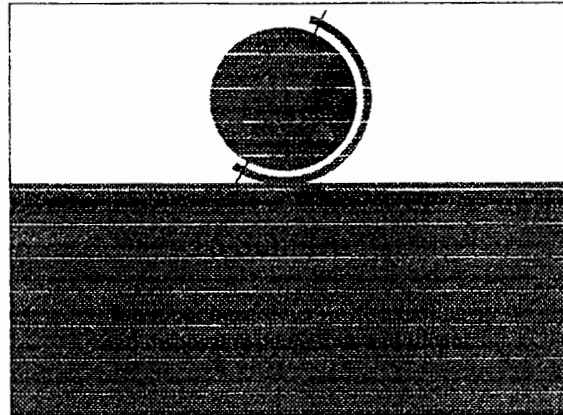
Hazardous Waste Recordkeeping

- ♦ HDC HazWaste Disposal Sheet
- ♦ Manifest Tracking System
- ♦ Copies: TSDI, Transporter, Generator
- ♦ Computer Program
- ♦ EPA requires a three year file retention



Hazardous Waste Container Requirements

- ♦ In house HDC Waste Identification Labels
- ♦ DOT Proper Shipping Information
- ♦ Hazard Labels
- ♦ Clean and Free of product residue
- ♦ Container integrity



Making Hazardous Waste Safe ...

- ♦ Knowing what the hazards are.
- ♦ Use safe handling procedures.
- ♦ Use protective clothing and equipment.
- ♦ Use documentation that tells what we are working with and what to do with it.
- ♦ Know what to do if something goes wrong



Be Sure To Sign
Attendance Sheet Before You
Leave.



Certificate of Achievement

HWMC

This certificate has been awarded to:

Scott VanAllen

at

Richmond, Virginia

*For successfully completing the Lion Technology Inc.
Hazardous/Toxic Waste Management
Annual Certification Workshop on the applicable regulations of the
United States Environmental Protection Agency and guidelines,
standards and procedures for safe and legal management of
wastes designated as hazardous.*

This training completed on: 28 January 2000

National Registry of Professionals - Member PIN: 021-0958



INSTRUCTOR

1.4 CEUs Awarded



Certificate of Achievement

HWMC

This certificate has been awarded to:

Chris Bagley

at

Richmond, Virginia

*For successfully completing the Lion Technology Inc.
Hazardous/Toxic Waste Management
Annual Certification Workshop on the applicable regulations of the
United States Environmental Protection Agency and guidelines,
standards and procedures for safe and legal management of
wastes designated as hazardous.*

This training completed on: 28 January 2000

National Registry of Professionals - Member PIN: 020-9557



INSTRUCTOR

1.4 CEUs Awarded

